Plant Packs

Rocky Flats Plant North American Space Operations P.O. Box 484 Golden, Colorado 80402-0484

Rockwell international

RCRA PART B PERMIT APPLICATION

HAZARDOUS WASTE

VOLUNES 1 AND 2

Copy 3 of 10 Copies

RF-860 (3/85)

Second Printing



Department of Energy

ALBUQUERQUE OPERATIONS ROCKY FLATS AREA OFFICE P.O. BOX 928 GOLDEN, COLORADO 80402-0928

November 1, 1985

HAND-DELIVERED

Mr. Randy Jones, Chief Hazardous Waste Permits Section Colorado Department of Health 4210 East 11th Avenue Denver, CO 80220

Dear Randy:

Enclosed is the U. S. Department of Energy's Part B Permit Application for hazardous wastes at the Department of Energy's Rocky Flats Plant. This Application is made pursuant to Section 3005 of the Resource Conservation and Recovery Act (RCRA), 25-15-303 Colorado Revised Statutes, and in response to the Colorado Department of Health's certified letter dated April 18, 1985. Although Rockwell International Corporation ("Rockwell") executes this Permit Application as "Operator" of the facility, it should be noted that the Department of Energy retains and exercises general control and responsibility for the facility's overall operations, including approval of facility and site modifications and improvements to meet environmental requirements. The Rocky Flats Plant is owned and controlled by the United States Government. All operations conducted at this facility are for the sole purpose of carrying out the responsibilities of the Department under the Atomic Energy Act of 1954 and the Department of Energy Organization Act. The day-to-day control and management of operations at this facility are conducted for the Department of Energy by Rockwell under a cost-type, advance-funds, management and operating contract.

You will note that the Application contains information for hazardous wastes activities and does not present data on "radioactive mixed wastes". A Part B Permit Application for "radioactive mixed wastes" will be filed with the Environmental Protection Agency by the November 8, 1985 statutory deadline to preserve our interim status for these waste units on the assumption that the Department of Energy and EPA promulgate rules defining "by-product material" which, like "source", and "special nuclear" material, will remain subject to exclusive Department of Energy control under the Atomic Energy Act. The rules will then leave "radioactive mixed wastes" to be regulated under both the Atomic Energy Act (radioactive aspects) and RCRA (chemical hazardous aspects). It is our understanding that the Department of Energy will issue proposed rules on this matter by November 6, 1985. We will furnish you with a copy of the proposed rules as soon as they are available.

ADMIN RECORD

It is also our understanding that after the Department of Energy and EPA rulemaking occurs, EPA may authorize the states to regulate "radioactive mixed wastes" under equivalent programs. If this occurs and Colorado is so authorized, we will, of course, be dealing directly with your office in the future on the Part B Application for "radioactive mixed wastes".

Please note the submitted Application does not include information on RCRA section 3004(u) or groundwater monitoring. Since Coloardo has not yet been delegated authority to implement the 1984 RCRA amendments, no section 3004(U) corrective action information is being provided at this time. Furthermore, EPA has recognized the existence of unresolved legal and policy issues surrounding the applicability of section 3004(u) to Federal facilities (see 50 F.R. 28702, July 15, 1985) and has stated that no Federal facility application will be rejected as incomplete for failure to include 3004(u) information. Groundwater monitoring information is not included in this submission because it is our position that Rocky Flats manages no RCRA "regulated units"; i.e. surface impoundments, landfills, waste piles or land treatment units.

Also please be advised that our Application bears the EPA identification number COD 078343407, which we presume to be correct as we have not received any official notification to the contrary. We did, however, notice a reference to our facility as EPA ID C07890010526 in EPA correspondence dated May 10, 1985.

We look forward to working with your Division in developing a workable and effective Part B Permit and pledge our cooperation and industry in this endeavor. A signed copy of this Permit Application is being sent concurrently to EPA due to the inclusion in the Application of information on recycle of radiographic solutions, a 1984 RCRA Amendment matter which we understand EPA will regulate at this time.

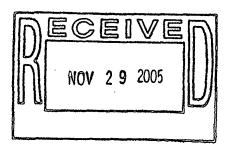
Sincerely,

Jerry L. Bellows Acting Area Manager

Enclosure

cc w/enc:

Mr. Lawrence A Wapensky, Ch., RCRA Permit Section, EPA



Volume 1

Resource Conservation and Recovery Act

PART B PERMIT APPLICATION CODO78343407

Submitted by

Department of Energy's Rocky Flats Plant Golden, Colorado

to

Colorado Department of Health Waste Management Division Denver, Colorado

1 November 1985

Prepared by

Roy F. Weston, Inc. 938 Quail Street Denver, Colorado 80215 In Association with Chen and Associates, Inc. Reviewed for Classification/UCNI/OUO

By: Janet Nesheima Derivative Classifier

Confirmed Unclassified, Not UCNI/Not OUO

VOLUME 1

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CODO78343407

Date: November 1, 1985

Revision No.: 0

ROCKWELL INTERNATIONAL ROCKY FLATS PLANT GOLDEN, COLORADO

Record of Amendments

Change Number	Delete Page(s)	, Add Page(s)	Date of Change

A - REVISED PART A APPLICATION

SECTION A

REVISED PART A APPLICATION (CHWR 100.4)

This section contains the revised and updated Part A application for the existing U.S. Department of Energy Rocky Flats Plant facility, as described in section D of this application.

A revised Part A application was submitted on 31 May 1985 and is on file with the U.S. Environmental Protection Agency (EPA) and the Colorado Department of Health (CDH) to describe the present facility, which is under interim permit status until a final permit is issued.

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XII. NATURE OF BUSINESS (provide a brief description)	
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XIII. CERTIFICATION (see instructions) I certify under penalty of law that I have personally exemined and an attachments and that, based on my inquiry of those persons imme application, I believe that the information is true, accurate and compfalse information, including the possibility of fine and imprisonment. A. NAME & OFFICIAL TITLE (type or print) P. SIGNATU	distely responsible for obtaining the information contained in the elete. I am aware that there are significant penalties for submitting (See Form 1, Attachment 2)
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EPA I.D. NUMBER: COD 078343407

Item X, E, Existing Environmental Permits (continued)

E. Other (specify)

AIR POLLUTION EMISSION NOTICES

The Rocky Flats Plant has filed Air Pollution Emission Notices (APENS) with the State of Colorado for 38 production and laboratory building emission points and for four steam plant boilers.

COLORADO DEPARTMENT OF HEALTH INCINERATOR PERMITS

Application

Number

Permit

C - 13,022

Building 776 Fluid Bed Incinerators

Other plant incinerators not expected to be used for hazardous wastes:

C - 12.931

Building 121 Incinerator

C - 12,932

Building 771 Incinerator

Note:

Previous Part A applications listed four additional incinerators. Two of these incinerators with permit application numbers C - 12,930.1 and C - 12,930.2 are in Building 371 and were never placed into active service. They will be disassembled and removed from the building. The other two with permit application numbers C - 12,115 and C - 12,896 were pilot-scale incinerators located in Building 701. They are no longer in service.

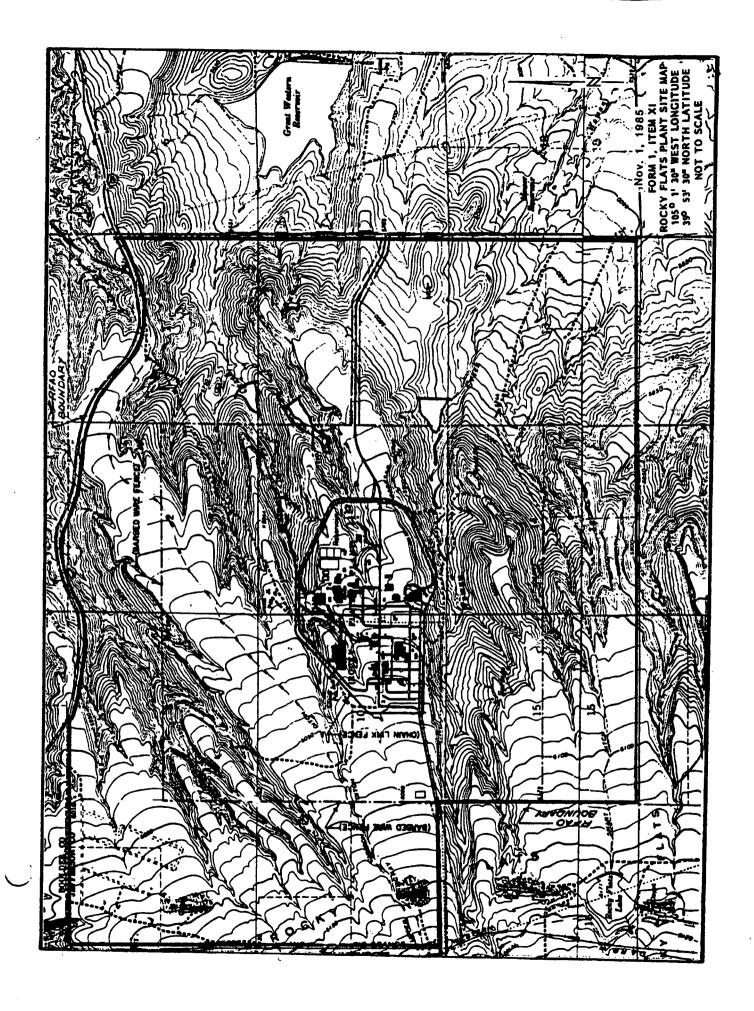
BROOMFIELD SATELLITE FACILITY WASTE WATER DISCHARGE PERMIT

This is a permit for a pipe fabrication facility operated by Rockwell International which is located in the City of Broomfield.

5927A 5993A

FORM 1 ATTACHMENT 2

This certification is made subject to the statements made in the attached cover letter dated November 1, 1985 and signed by J.L.Bellows.



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PAGE 1 OF 5

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HAZARDOUS WASTE PERMIT APPLICATION Consolidated Permits Program F. C. O. D. O. 7 B. 3 4 3 4	07 1
	0 7 1
RCRA (This information is required under Section 3005 of RCRA.)	
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APPLICATION DATE RECEIVED COMMENTS	
HI. FIRST OR REVISED APPLICATION	
Place an "X" in the appropriate box in A or B below (mark one box only) to indicate whether this is the first application you are submitting for you revised application. If this is a revised application, enter y EPA I.D. Number, or If this is a revised application, enter y EPA I.D. Number in item I above.	our facility or a our facility's
A. FIRST APPLICATION (place on "X" below and provide the appropriate date) [A] 1. EXISTING FACILITY (See instructions for definition of "existing" facility. Complete literal below.) Complete See instructions for definition of "existing" facility.	FACILITIES.
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III. PROCESSES - CODES AND DESIGN CAPACITIES	, all
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describe the process (including its design capacity) in the space provided on the form (Item III-C).	s below, then
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EXAMPLE FOR COMFLETING ITEM III (shown in line number X-1 and X-2 below): A facility has two storage tanks, one tank can half 200 call	ions and the
other can note 400 gallons. The facility also has an incinerator that can burn up to 20 gallons per hour.	,,,,
C DUP TO THE TOTAL OF THE PARTY	///
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0.00673 MT/hr

PAGE 1 OF 5

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EXAMPLE FOR COMPLETING ITEM other can hold 400 gallons. The facility	ii iii <i>(shown in lin</i> Iy atso has an inch	numbers X retor that	(-1 <i>and</i> can bui	X-2 belo	w): A 20 antic	fecil	ity has two storeg ar hour.	e tenks, one tank ca	n hold 2	100 gal	lons ar	nd the	- 1
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III. PROCESSES (continued)

c. space for additional process codes or for describing other processes (code "T04"). For each process entered here include design capacity.

TO3 - Fluidized Bed Incinerators

T04 - miscellaneous bench chemical destructions for gases, and other small quantities of wastes

T04 - Silver Recovery

IV. DESCRIPTION OF HAZARDOUS WASTES

- A. EPA HAZARDOUS WASTE NUMBER Enter the four—digit number from 40 CFR, Subpart D for each listed hazardous waste you will handle. If you handle hazardous wastes which are not listed in 40 CFR, Subpart D, enter the four—digit number(s) from 40 CFR, Subpart C that describes the characteristics and/or the toxic conteminants of those hazardous wastes.
- B. ESTIMATED ANNUAL QUANTITY For each listed waste entered in column A estimate the quantity of that waste that will be handled on an annual basis. For each characteristic or toxic contaminant entered in column A estimate the total annual quantity of all the non-listed waste/s/ that will be handled which possess that characteristic or contaminant.
- C. UNIT OF MEASURE For each quantity entered in column 8 enter the unit of measure code. Units of measure which must be used and the appropriate codes are:

ENGLISH UNIT OF MEASURE	CODE	METRIC UNIT OF MEASURE	CODE
POUNDS		KILOGRAMS	K
TONS ,	T	METRIC TONS	M

ity records use any other unit of measure for quantity, the units of measure must be converted into one of the required units of measure taking into It the appropriate density or specific gravity of the waste.

D. PROCESSES

1. PROCESS CODES:
For listed hazardous wasts: For each listed hazardous wasts entered in column A select the code(s) from the list of process codes contained in Item III to indicate how the waste will be stored, treated, and/or disposed of at the facility.

For non-listed hazardous wastes: For each characteristic or toxic contaminant entered in column A, select the code(s) from the list of process codes contained in Item III to indicate all the processes that will be used to store, treat, and/or dispose of all the non-listed hazardous wastes that possess

that characteristic or toxic contaminent.

Note: Four spaces are provided for entering process codes, if more are needed: (1) Enter the first three as described above; (2) Enter "000" in the extreme right box of (tem IV-D(1); and (3) Enter in the space provided on page 4, the line number and the additional code(s).

2. PROCESS DESCRIPTION: If a code is not listed for a process that will be used, describe the process in the space provided on the form,

NOTE: HAZARDOUS WASTES DESCRIBED BY MORE THAN ONE EPA HAZARDOUS WASTE NUMBER - Hezerdous westes that can be described by more than one EPA Hazardous Waste Number shall be described on the form as follows:

- Select one of the EPA Hazardous Waste Numbers and enter it in column A. On the same line complete columns B,C, and D by estimating the total annual quantity of the waste and describing all the processes to be used to treat, store, and/or dispose of the waste.
 In column A of the next line enter the other EPA Hazardous Waste Number that can be used to describe the waste. In column D(2) on that line enter
- "included with above" and make no other entries on that line.
- 3. Repeat step 2 for each other EPA Hazardous Waste Number that can be used to describe the hazardous wests.

EXAMPLE FOR COMPLETING ITEM IV (shown in line numbers X-1, X-2, X-3, and X-4 below) - A facility will treat and dispose of an estimated 900 pounds per year of chrome shavings from leather tanning and finishing operation. In addition, the facility will treat and dispose of three non-listed wastes. Two wastes are corrosive only and there will be an estimated 200 pounds per year of each waste. The other waste is corrosive and ignitable and there will be an estimated 100 pounds per year of that waste. Treatment will be in an incinerator and disposal will be in a landfill.

		Ą.	EP/	•			UNIT	L		_				_					D. PROCESSES
LINE NO.	A. EPA HAZARD. B. ESTIMATED ANNUAL O WASTENO Z (enter code)							1. PROCESS CODES (enter)											2. PROCESS DESCRIPTION (if a code is not entered in D(1))
X-1	K	0	5	4	900		P	T	0	3	D	8	0		1			7	
X-2		,	0	2	400		P	T	0	3	D	8	0				1	1	
Х-	_	70	0	I	100		P	T	0	3	D	8	0				1		
X-4	D	0	0	2					1	1	T	1	1		1		T	1	included with above

EPA Form 3510-3 (8-80)

PAGE 3 A-3GOF 5

tenter "A", "B" "C", etc. benint the "3" to identify pro recipied pages.

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EPA Form 3510-3 (6-80)

EV. DESCRIPTION OF HAZAEDOUS NASTES C E. USE THIS SPACE TO LIST ADDITIONAL PRO		
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Line 23 - Quantity is amount of latex base, etc.) the	f used/surplus paint of various t at was generated during FY 83.	types (oil base,
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V. FACILITY DRAWING All existing facilities must include in the space provided or	non-thing with a property and the second	THE LOCAL STATE OF LINES WITH THE PARTY OF
VI. PHOTOGRAPHS	in page 5 a scale drawing of the facility (see instructions	
All existing facilities must include photographs (ae treatment and disputal areas) and sites of future st	rial or ground—level) that clearly delineate all expresses, treatment or distinct asea, is to instruction	isting structures; existing storese
VII. FACILITY GEOGRAPHIC LOCATION	· · · · · · · · · · · · · · · · · · ·	
LATITUDE (degrees, minutes, & second	LONGITUDE	(degrees, minutes, & seconds)
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□ A. If the facility owner is also the facility operator as skip to Section IX below.	s listed in Section VIII on Form 1, "General Information	n", place an "X" in the box to the laft and
	listed in Section VIII on Form 1, complete the follows	ing items:
	LITY'S LEGAL OWNER	
UNITED STATES DEPARTMENT OF ENE	RGY	3 0 3; 9 6 6 2 0 2 5
3. STREET OR P.O. BOX	4. CITY OF TOWN	5. ST. E ZIF CODE
F P.O. Box 928	G Golden	C;0 8,0,4,0,2
IX. OWNER CERTIFICATION	P 15. A 16.	AL CONTRACTOR OF THE PARTY OF T
I certify under penalty of law that I have personally documents, and that based on my inquiry of those submitted information is true, accurate, and complined including the possibility of fine and imprisonment.	individuals immediately responsible for obtaining	y the information, I believe that the
A. NAME (Pent or tyra)	B SIGNATURE	C DATE SIGNET
J.L.Bellows A. O'lic Tell (1879) (1875)		
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including the possibility of fine and imprisonment.		
ME (print or type)	B. SIGNATURE	C. DATE SIGNED
.E.Dorr	1 75000	Ox 30, 1982
L orm 3510-3 (6-80)	PAGE 4 OF 5	CONTINUE ON PAGE !

V. FACILITY DRAWING (see page 4)

See attached Rocky Flats Facility Plan, Map, and Rocky Flats Area Plan See attached maps and photographs:

Rocky Flats Aerial Photograph

Rocky Flats Plant Site Map

Rocky Flats Legal Site Boundaries Description Drawing

Rocky Flats Plant Facility Drawing

Rocky Flats Photographs Showing Toxic Gas Container Storage Shed (2)

Rocky Flats Photographs Showing Hazardous Waste Storage Facilities (2)

Rocky Flats Photograph Showing Door Arrangement of Hazardous Waste Storage Facility

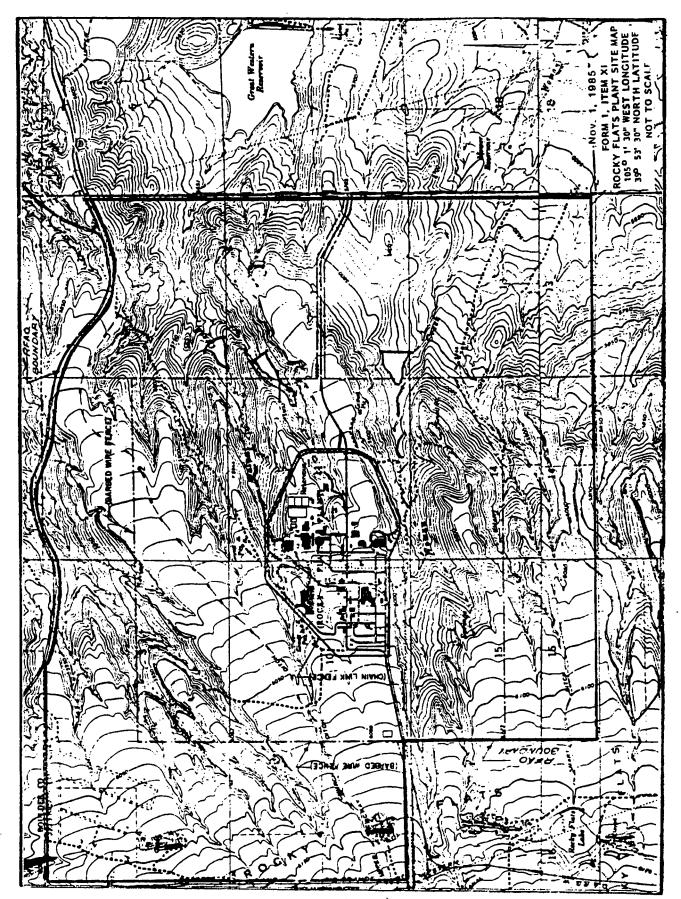
Rocky Flats Photograph Showing Interior Arrangement of Drums in Waste Storage Facility

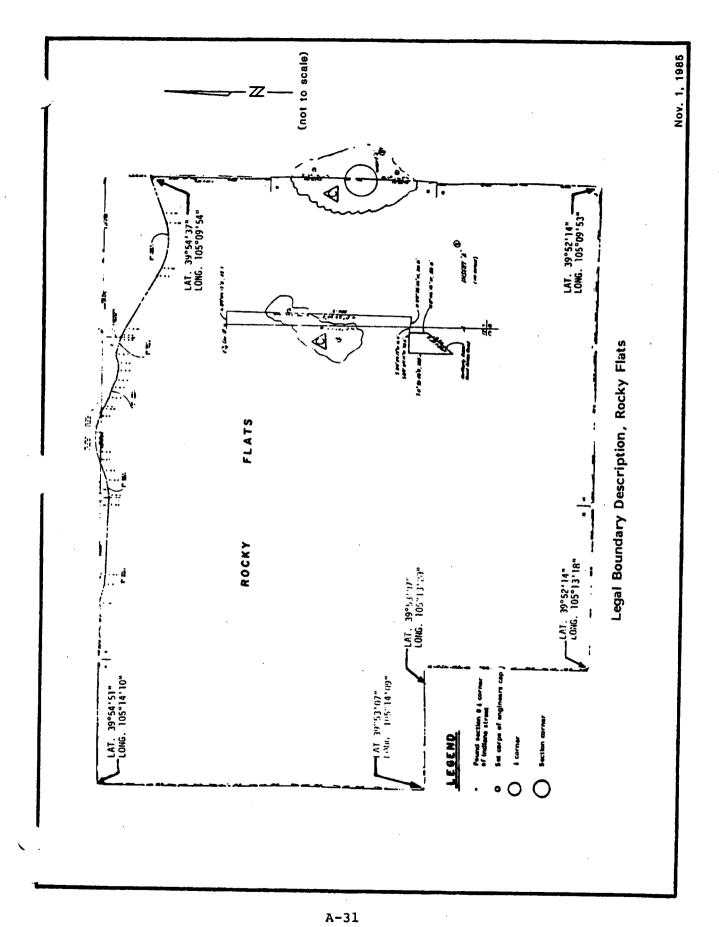
Rocky Flats Photograph Showing Overall View of Incinerator

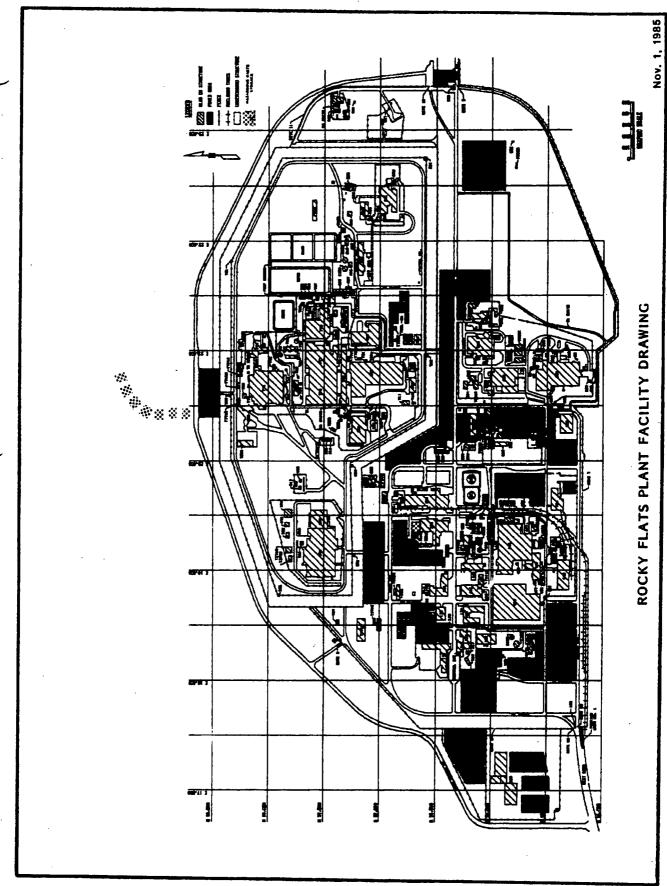
Rocky Flats Photograph Showing Silver Recovery Process Area

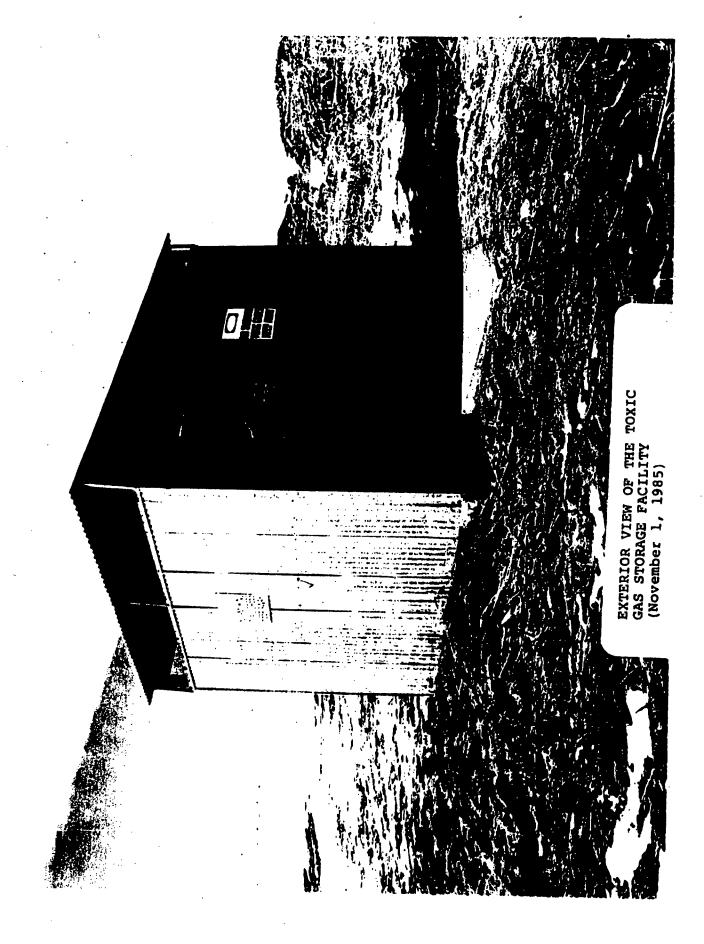
Rocky Flats Photograph Showing Electrochemical Milling Sludge



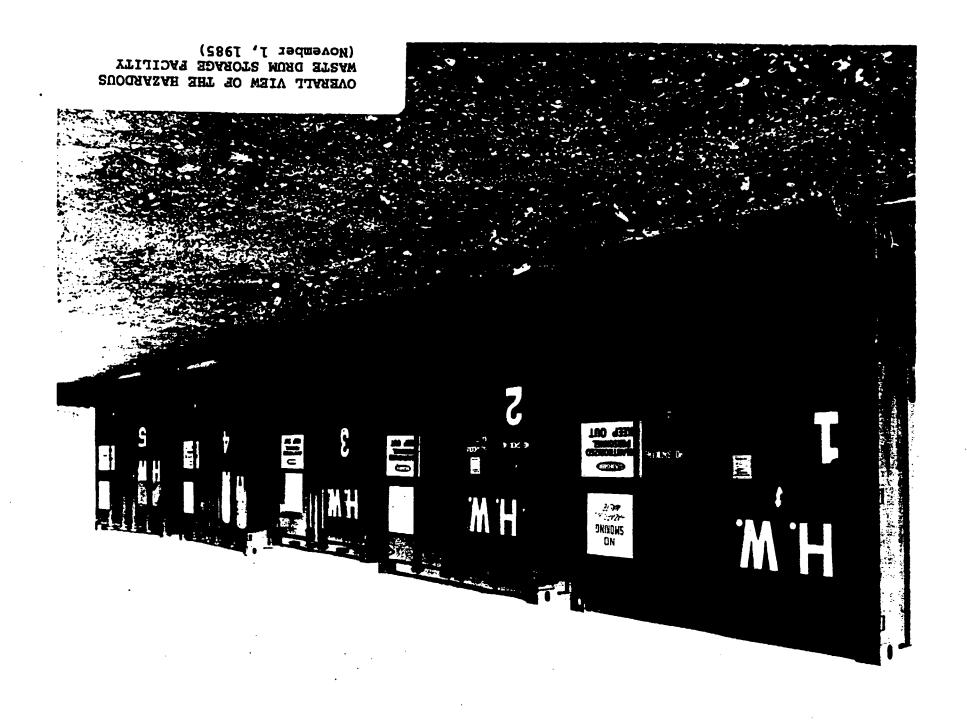


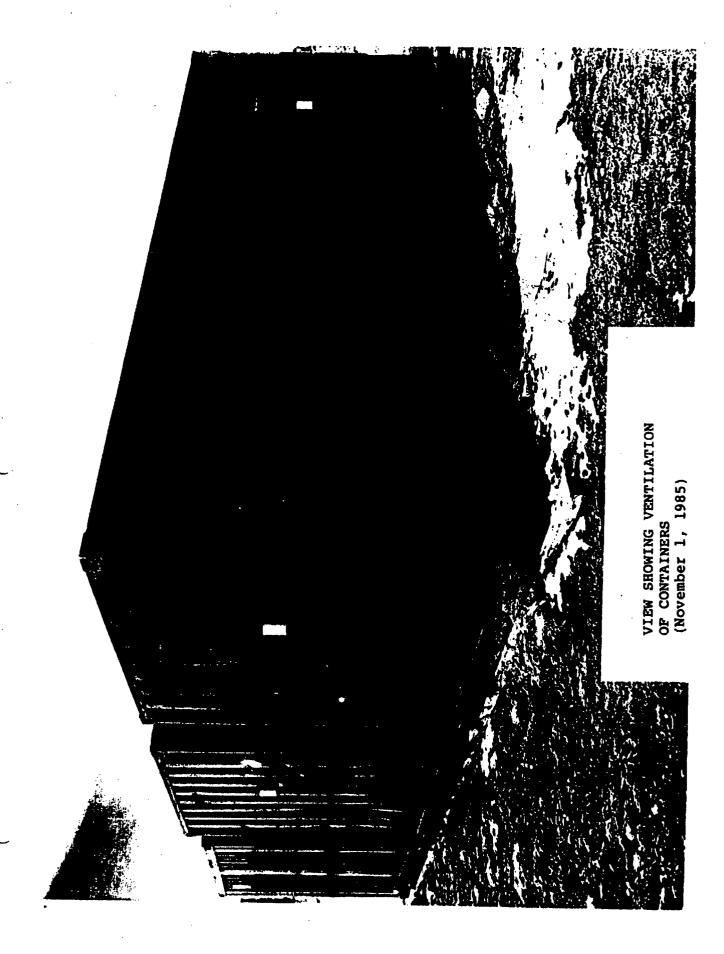


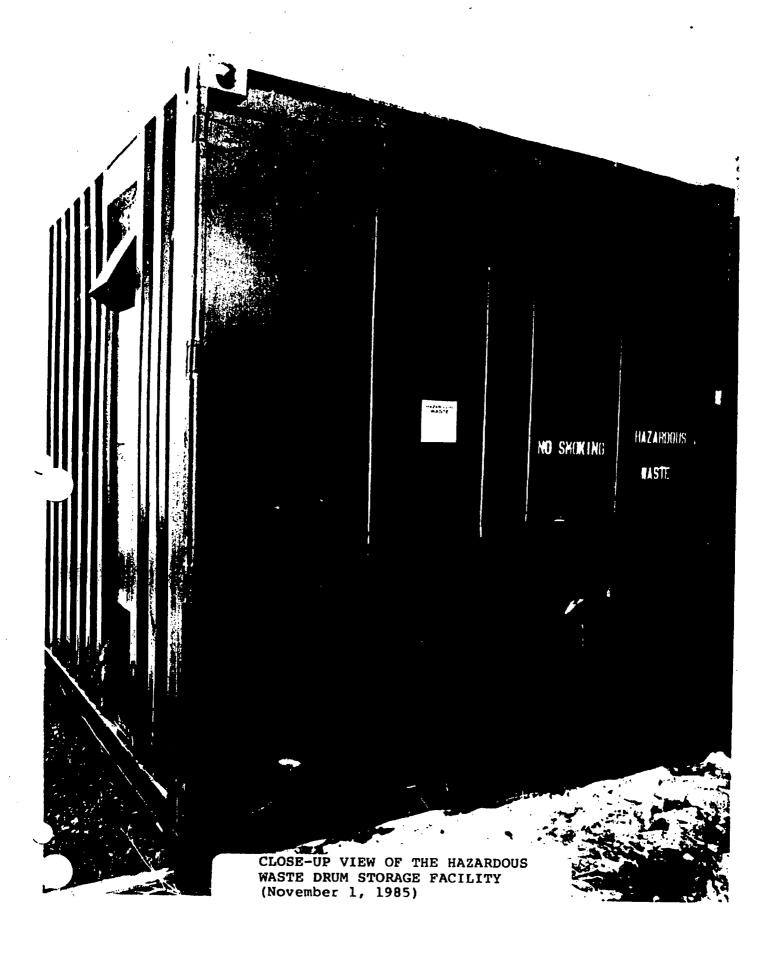


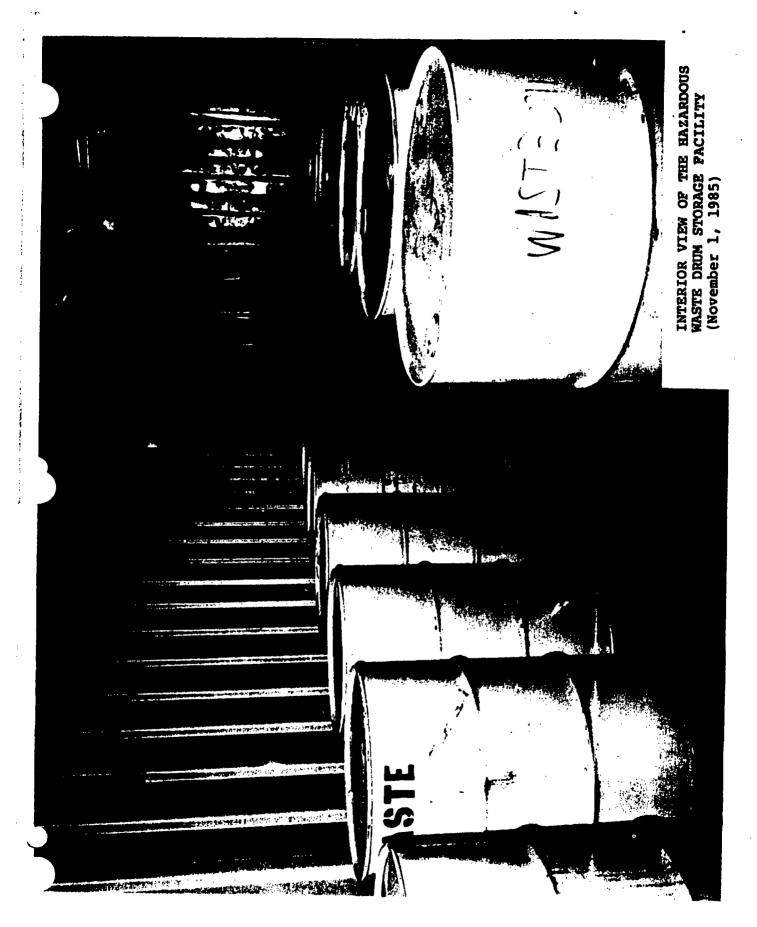


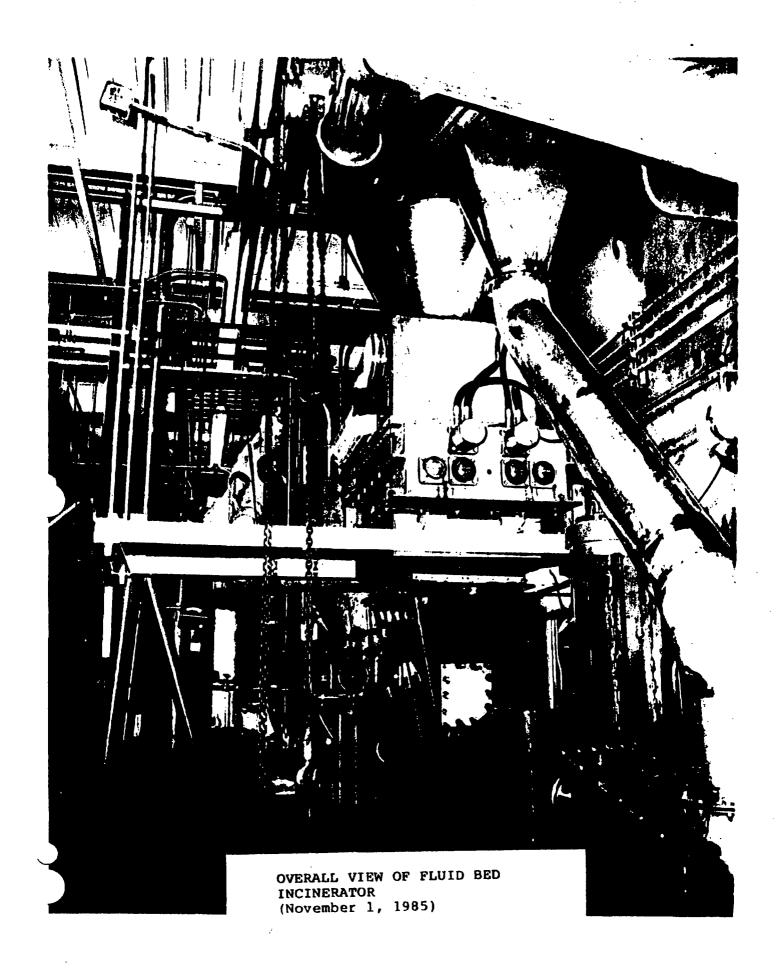
INTERIOR VIEW OF THE TOXIC GAS STORAGE FACILITY (November 1, 1985) **医型 建设建筑** BELLEY WY. A PROPERTY OF















B - FACILITY DESCRIPTION

SECTION B

FACILITY DESCRIPTION

This section provides a general description of the Rocky Flats hazardous waste management facility. This description is intended to acquaint the permit application reviewer and permit writer with an overview of the facility. More complete details can be found in other sections of this permit application.

- B-1 General Description (40 CFR 270.14 (b)(1); CHWR 100.41 (a)(1))
- B-la Facility Name

United States Department of Energy Rocky Flats Plant

B-lb Facility Contact

J. L. Bellows, Acting Area Manager Phone: 303-966-2025

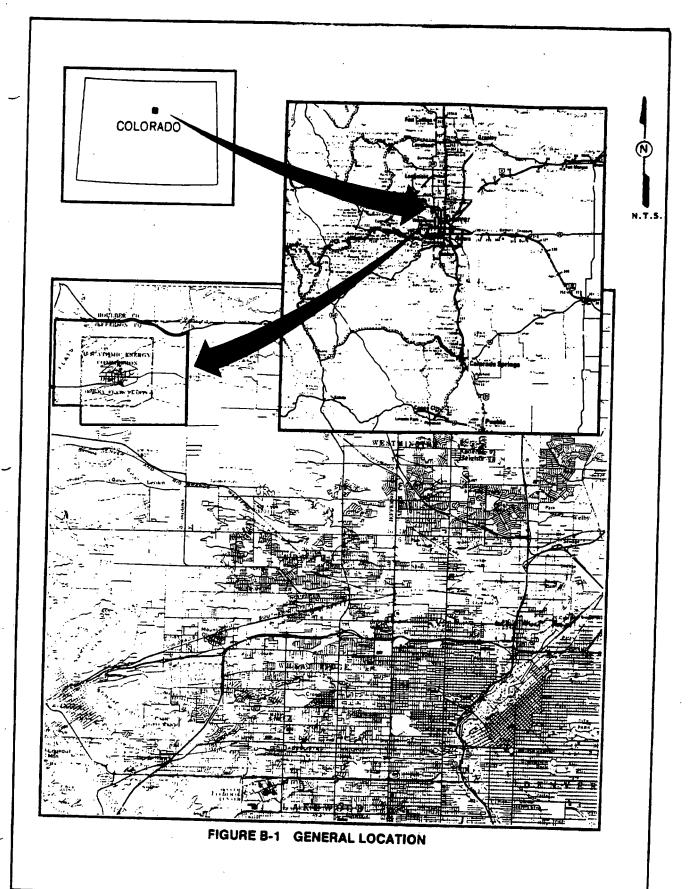
B-lc Facility Mailing Address

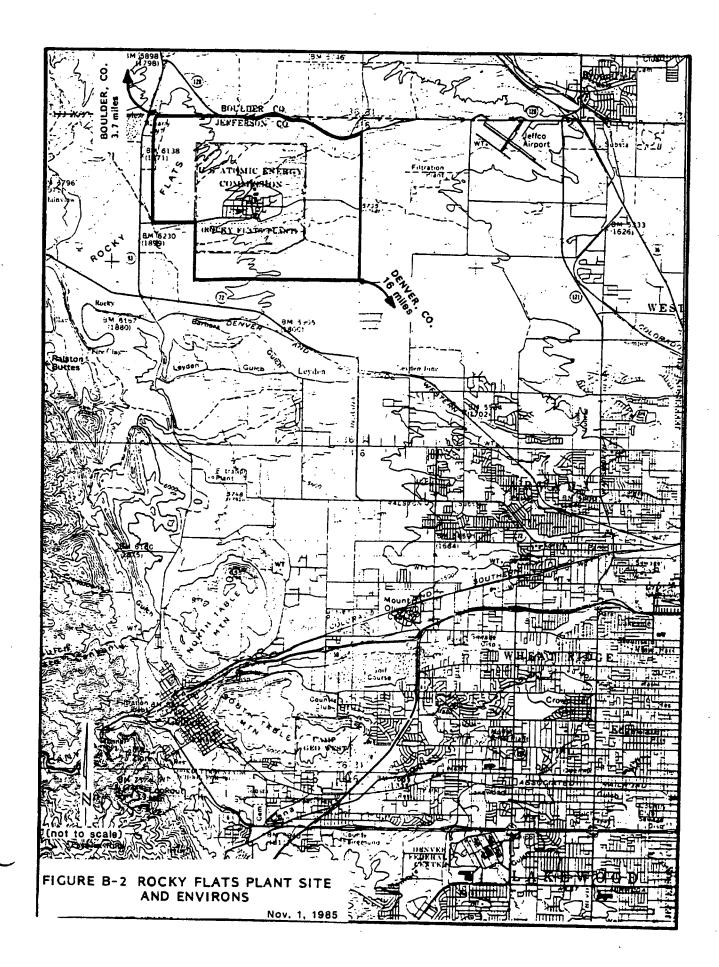
P.O. Box 928 Golden, Colorado 80402

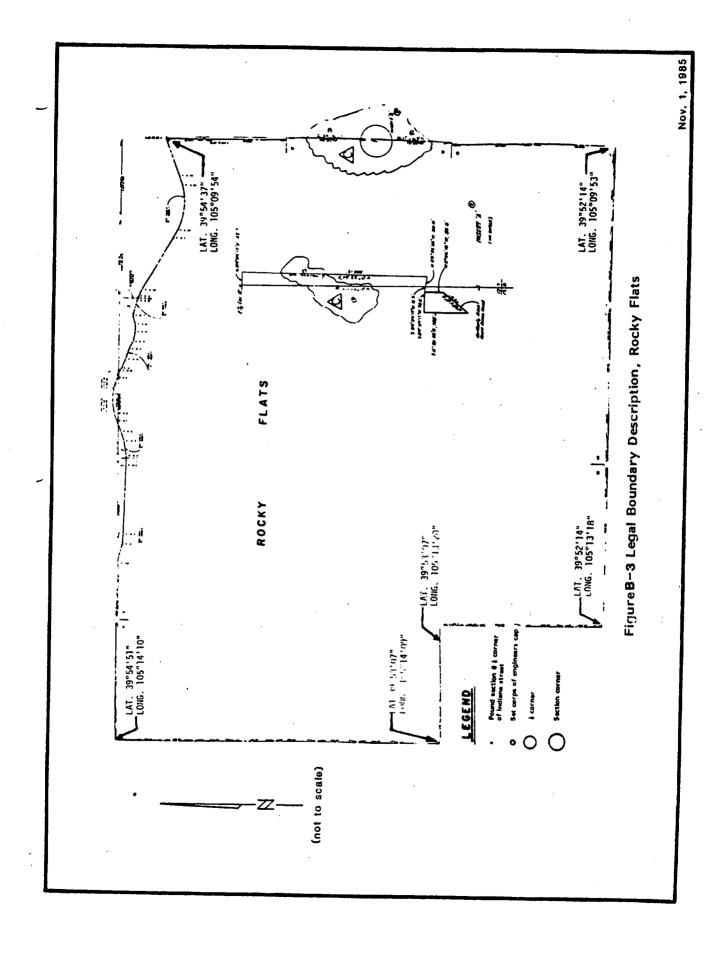
B-ld Facility Location

The Rocky Flats Plant covers almost 11 square miles of Jefferson County, Colorado. The facility is centered at 105°11' 30" west longitude, 39°53' 30" north latitude. As shown in Figure B-1, this location is 16 miles northwest of Denver and 9 to 12 miles from the communities of Boulder, Golden, and Arvada. It is bounded on the north by State Highway 128, on the west by State Highway 93, on the south by State Highway 72, and on the east by Jefferson County Highway 17. Figure B-2 is a map of the immediate vicinity of the Rocky Flats Plant. The legal boundaries of the Plant property are shown in Figure B-3.

Situated at an elevation of about 6,000 feet, the Plant is on the eastern edge of a geological bench known locally as Rocky Flats. This rocky bench, which is about 5 miles wide in an east-west direction, flanks the eastern edge of the abruptly rising foothills of the Rocky Mountains. The Continental Divide is approximately 26 miles west of the Plant.







Date: November 1, 1985 Revision No.: 0

B-le Nature of Business

The Rocky Flats Plant is a Government-owned facility with the primary mission of producing plutonium components for nuclear weapons. Production activities involve the fabrication of plutonium, uranium, beryllium, and stainless steel parts. Other activities include chemical processing to recover plutonium from scrap material, R&D work in metallurgy, machining, assembly, nondestructive testing, coatings, remote engineering, chemistry, and physics. Parts made at the Plant are shipped elsewhere for final assembly.

B-lf Brief Description of Processes Involved in Generation of Hazardous Wastes

Production activities include metal fabrication and assembly, chemical recovery and purification of process-produced transuranic radionuclides, and related quality control functions. Research and engineering programs supporting these activities involve chemistry, physics, materials technology, ecology, nuclear safety, and mechanical engineering.

Approximately 102 structures on the Plant site contain about 214,000 square meters (2.29 million square feet) of floor space. Of this space, major manufacturing, chemical processing, plutonium recovery, and waste treatment facilities occupy about 170,000 square meters (1.83 million square feet).

Major laboratory and research buildings occupy about 13,850 square meters (149,000 square feet). The remaining floor space is divided among administrative, utility, security, warehouse storage, and construction contractor facilities.

B-2 Topographic Map (40 CFR 270.14 (b) (19))

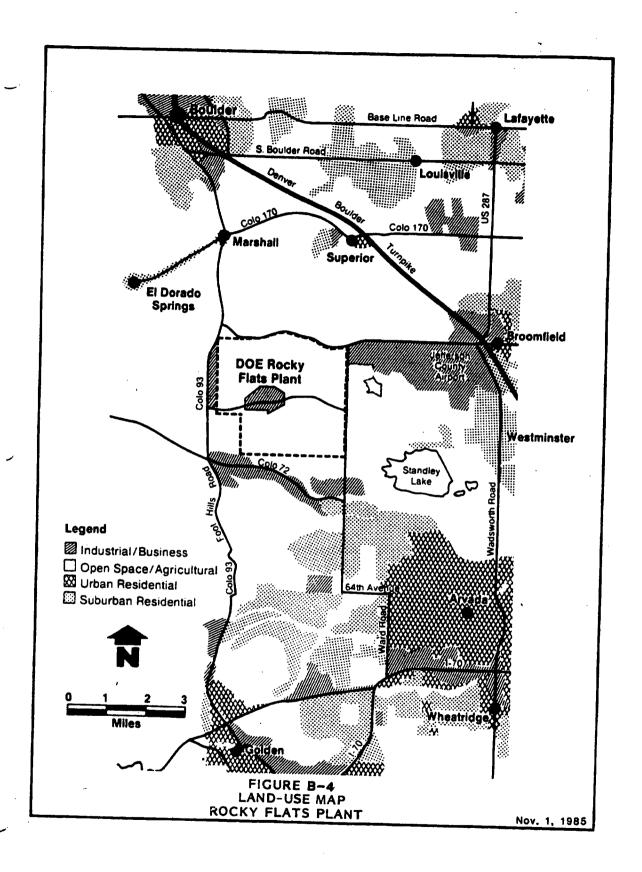
B-2a General Requirements

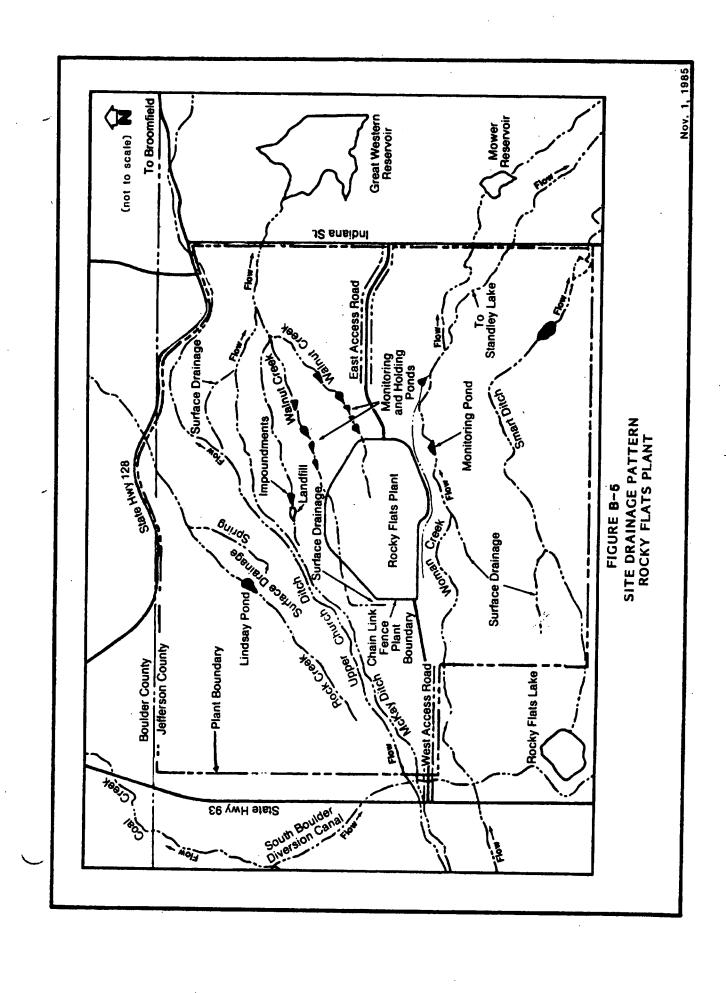
The topographic map presented as Figure B-2 shows the Rocky Flats Plant site, facility boundaries, and contiguous areas surrounding the facility at a distance of over 1,000 feet around the Plant property boundary. The scale is 1 inch = 2000 feet.

Date: November 1, 1985 Revision No.: 0

Land Uses: Land use plans and zoning maps were acquired for Adams, Boulder, and Jefferson counties and for the cities of Arvada, Broomfield, Golden, Westminster, and Wheat Ridge. The general area of interest was reviewed and a composite land use planning map was developed from the above sources. The composite land use map is presented in Figure B-4.

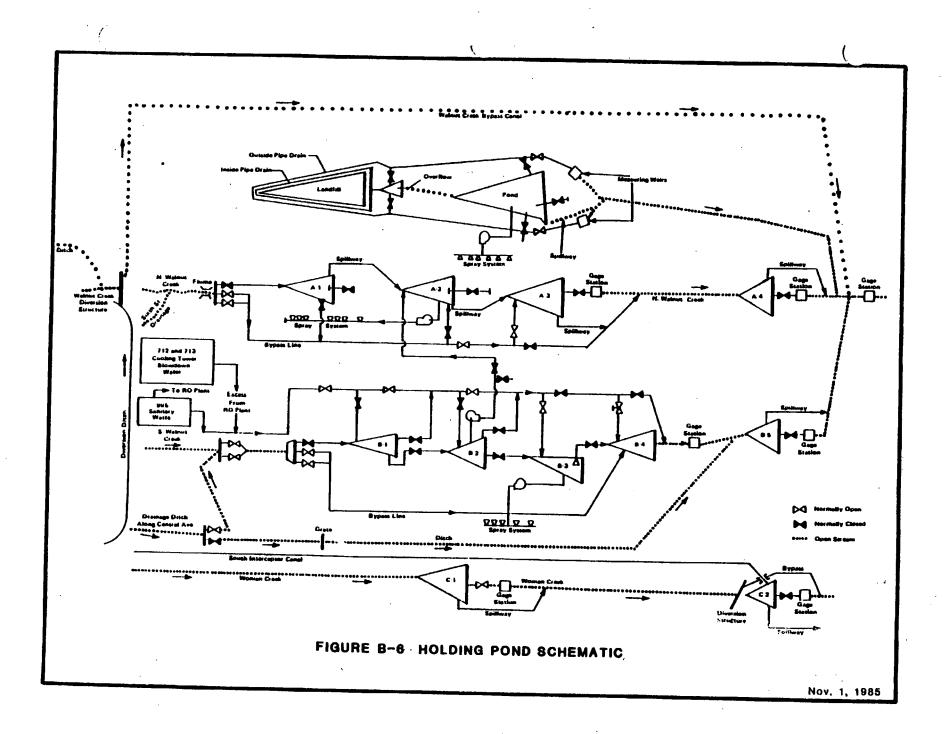
Surface Waters. Drainage Patterns. Controls: Five Streams occur near the Rocky Plats Plant site. Of these, North Walnut Creek, South Walnut Creek, and Woman Creek drain the Rocky Plats Plant site; all of these are intermittent wet weather creeks. The other two streams in the area are Coal Creek and Rock Creek. North Walnut Creek and South Walnut Creek flow eastward into Great Western Reservoir. Great Western Reservoir supplies water to the City of Broomfield. Woman Creek originates west of the Plant, drains the south portion of the Plant site, and flows eastward into Standley Lake. Standley Lake provides irrigation storage and the municipal water supply for the City of Westminster. Coal Creek has its headwater in the Front Range and is the largest stream near the Plant. Coal Creek and Rock Creek drain the area north of the Plant. The Rocky Flats site and environs drainage pattern and the location of streams is shown in Figure B-5.





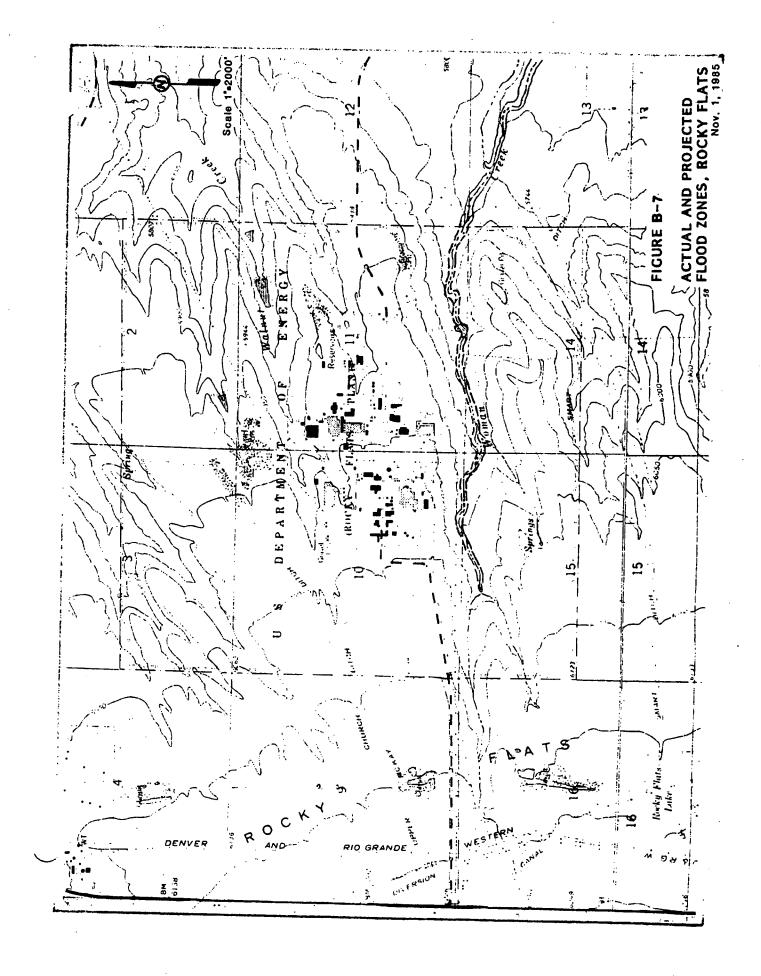
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Figure B-6 presents in greater detail the monitoring and holding ponds which are associated with controlling surface water discharges from the Plant site. Additionally, these ponds are integral parts of emergency facilities and are discussed later in Sections F and G.



Flood Plain: Woman Creek flows easterly along the southern portion of the Rocky Flats site. The portion of the creek flowing through the Plant site is not included on the Federal Emergency Management Agency (FEMA) Flood Insurance Rate Map. However, it is clear that Plant facilities are well out of the 100-year flood plain for Woman Creek if the flood plain is extended through the property. Figure B-7 is a representation of the designated 100-year flood plain as well as the hypothetical extension of the flood plain.

Groundwater and Hydrogeology: Hazardous wastes at the Rocky Flats Plant are not disposed of on-site; rather the wastes are stored prior to reuse, recycling and/or shipping off-site for disposal and are exempt from groundwater monitoring requirements as stated in 264.90, 264.1 and 261.6(a)(2).



Hazardous Waste Management Facility Boundary: Figure B-8 shows the

locations of hazardous waste management units on the Plant site.

Injection and Withdrawal Wells: The site has no injection wells for waste disposal or withdrawal wells for water supply. Wells for monitoring groundwater and geohydrologic conditions at the Plant site are situated at various locations throughout the Plant site.

Access Control: The entire site is surrounded by a three-strand cattle fence. The high security area of the site is surrounded by a 6-foot high chain link fence, topped by 2 feet of three-strand barbed wire. Entrance ways are patrolled 24 hours per day. Figure B-9 shows the locations of fences and gates as well as access and internal roads.

Buildings and Structures: The locations of existing buildings or structures, paved or unpaved parking areas, fences, railroad tracks, and underground structures are shown in Figure B-8 and Photograph in Section A. An on-site grid system is also presented.

Plant buildings are concentrated in a small area (384 acres) surrounded by a security fence. Land between that fence and the site boundaries, encompassing 6,166 acres, serves as a buffer zone between the Plant and the public. A cattle fence on the site perimeter is posted to identify the land as a restricted area. Developments in the buffer zone include firebreaks, holding ponds on three watercourses, environmental monitoring stations, a sanitary landfill area, salvage yard, power lines, inactive gravel pits, target range, and access roads.

Two access roads, one from State Highway 93 to the west and one from County Highway 17 to the east, pass through the security fence that encircles the main area of the Plant. Within this central facility are about 100 buildings, none over three stories above the ground. Plant visibility from nearby highways varies, depending on a viewer's location. The most prominent structures are the 200-foot meterological tower, 155-foot water tower, three building stacks measuring, respectively, 69, 98, and 151 feet in height, and the new plutonium recovery and waste treatment facility.

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As shown in Figure B-8, the Plant is divided into several areas constituting separate operational complexes. Each building within an area is identified by a three-digit number; the first digit signifies the area in which the specific building is located. There is no 200 area as such. Numbers in the 200 series are applied to miscellaneous facilities that are distributed throughout the Plant site. Examples are utility structures and parking lots. The major production complexes are in the 400, 700, and 800 areas.

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Recreation Areas: Public lands are located adjacent to the Plant on the east boundry. Currently there are no recreational facilities on these lands.

Storm and Sanitary Sewers and Utilities: Sanitary waste lines collect human wastes and convey them to the sanitary waste (sewage) treatment plant. Effluents from the sewage plant flow into holding ponds which are monitored on a regular basis. Sanitary wastewater is kept separate from all process wastewaters and is routinely monitored. Water for domestic use, process uses, and fire-fighting is provided by the Denver Water Board.

Rocky Flats has ditches, culverts, and underground pipes for collecting and controlling surface water runoff. Surface water runoff from inside the security fence leaves the plant through North and South Walnut Creek drainage ways and Walnut Creek. These waters are monitored prior to discharge.

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Wind Rose: Wind, temperature, and precipitation data were collected on the Plant site during 1984. Table B-1 presents the 1984 annual summary of the percent frequency of wind directions (16 compass points) divided into four speed categories. The compass point designations indicate the true bearing when facing against the wind. These frequency values are represented graphically in Figure B-9. The wind rose vectors also represent the bearing against the wind (i.e., wind along each vector blows toward the center). The predominance of northwesterly winds is typical of Rocky Flats. The low frequency of winds greater than 7 meters per second (15.6 mph) with easterly components is also normal.

TABLE B-1. Wind Direction Frequency (Percent), by Four Wind-Speed Classes, at the Rocky Flats Plant

	(Fifteen-Minute Averages1984a)					
	Calm	1-3 (m/s)b	3-7 (m/s)	7-15 (m/s)	15 (m/s)	TOTAL
-	0.81	-	-	-	_	0.81
N	· -	2.68	3.47	1.03	0.00	7.18
NNE	_	2.98	2.08	0.45	0.00	5.51
NE	-	2.66	1.21	0.07	0.00	3.94
ENE	-	2.25	0.55	0.01	0.00	2.80
E	-	2.50	0.51	0.01	0.00	3.02
ESE	-	2.69	1.49	0.02	0.00	4.21
SE	-	3.13	2.73	0.03	0.00	5.89
SSE	-	3.04	3.53	0.14	0.00	6.71
S	-	3.07	3.66	0.16	0.00	6.89
SSW	_	3.08	3.21	0.11	0.00	6.40
SW	•••	3.07	2.87	0.18	0.00	6.11
WSW	-	3.03	3.85	0.58	0.00	7.46
W	-	3.08	3.01	1.22	0.30	7.61
WNW	-	2.74	4.24	3.46	0.55	10.98
NW	-	2.46	3.70	1.64	0.03	7.83
NNW	-	2.13	3.95	0.56	0.00	6.64
TOTALS	0.81	44.59	44.07	9.65	0.87	100.00

aData obtained from sensors located \sim 10m (33 ft) above the ground.

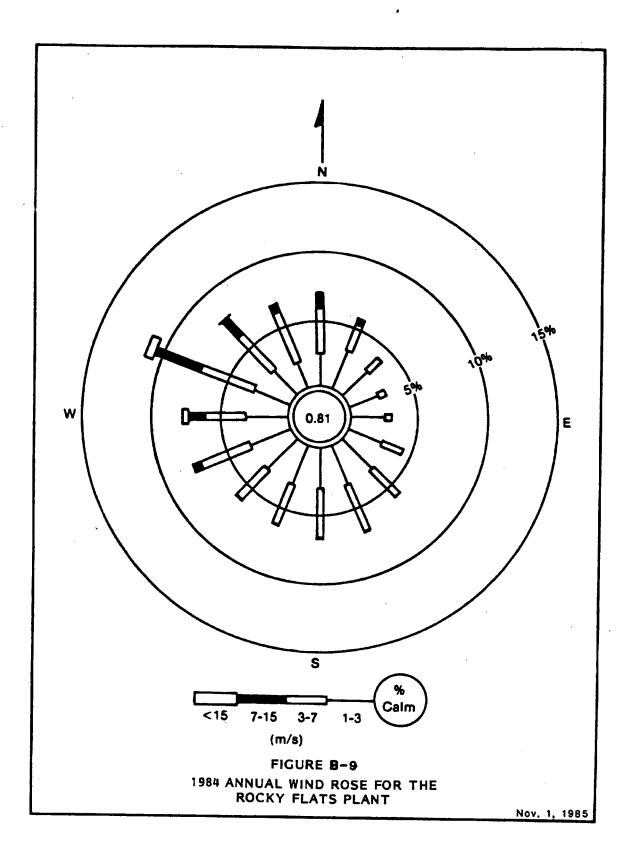
bFor conversion purposes, miles per hour (mph) equals 2.237 multiplied by meters per second (m/s).

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Fire Control Facilities: The Rocky Flats Plant maintains a completely self-contained Fire Department with permanent staff and equipment on-site. As a unit of the Plant and Security Department, the Fire Department is responsible for:

- 1. Answering any fire alarm and extinguishing any fire.
- 2. Responding to any hazardous waste spill.
- 3. Performing preventive maintenance inspections of all buildings and areas within the Plant site for potential fire hazards.
- 4. Ensuring the proper maintenance of fire fighting equipment at the Central Fire Station and other equipment located throughout the Plant.
- 5. Maintaining the classroom and field education and training program in fire-fighting techniques and first aid and providing other specialized training.
- 6. Providing mutual aid to surrounding metropolitan communities, if requested and approved through the DOE.
- 7. Fîrst aid responses

The Fire Department has 25 members who provide 24-hour service on a platoon schedule. As additional support, volunteer employees in manufacturing buildings comprise Fire Brigades.



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The Fire Department equipment consists of:

- 1. Two pumper trucks.
- 2. One water tanker truck.
- 3. One fully equipped ambulance.
- 4. One fully equipped rescue vehicle.
- 5. One "brush" truck, used primarily for grass fires.
- 6. Two general purpose vehicles.

Plant buildings are equipped with various types of fire detection and extinguishing equipment. Major buildings are equipped with sprinkler systems. All members of the Fire Department receive continuous training in fire-fighting techniques and response to hazardous material spills. Members are also trained in first aid procedures and as Emergency Medical Technicians (EMT) for health and safety purposes related to possible accidents.

Water Supplier: Raw water is purchased from the Denver Water Board and is drawn from the Ralston Reservoir and the South Boulder Diversion Canal. The Rocky Flats Plant used approximately 477 million liters (126 million gallons) of water during 1984.

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Electric and Gas Utilities: All of the Plant's heating requirements are met by in-plant steam boilers that normally use natural gas and are capable of using low-sulfur fuel oil. During Calendar Year 1984, approximately 21.9 million cubic meters (775 million cubic feet) of natural gas were used. Ninety-one thousand liters (24,000 gallons) of fuel oil were used during 1984.

B-3 Location Information (40 CFR 270.14 (b)(11); CHWR 100.41(a)(1))
B-3a Seismic Considerations

B-3a(1) Tectonic History

The Rocky Flats Plant site is located about 4 miles east of the Front Range Foothills in the Colorado Piedmont Section of the High Plains. The predominant geologic structure in this area is the Front Range Monocline which forms the western limb of the Denver Structural Basin. North trending hogback ridges along the west side of the Monocline are formed by steeply dipping overturned sedimentary beds. These sedimentary beds are flanked in the west by the Precambrian crystalline terrain of the Front Range Uplift and on the east by the gently dipping sedimentary beds of the Denver Structural Basin. The Golden Fault, a large reverse fault, cuts the Front Range Monocline about 2 miles southwest of the Rocky Flats Plant site. This fault extends about 17 miles to the south. The stratigraphic throw on the Golden Fault is reported to be about 9,000 feet (Dames and Moore, 1981).

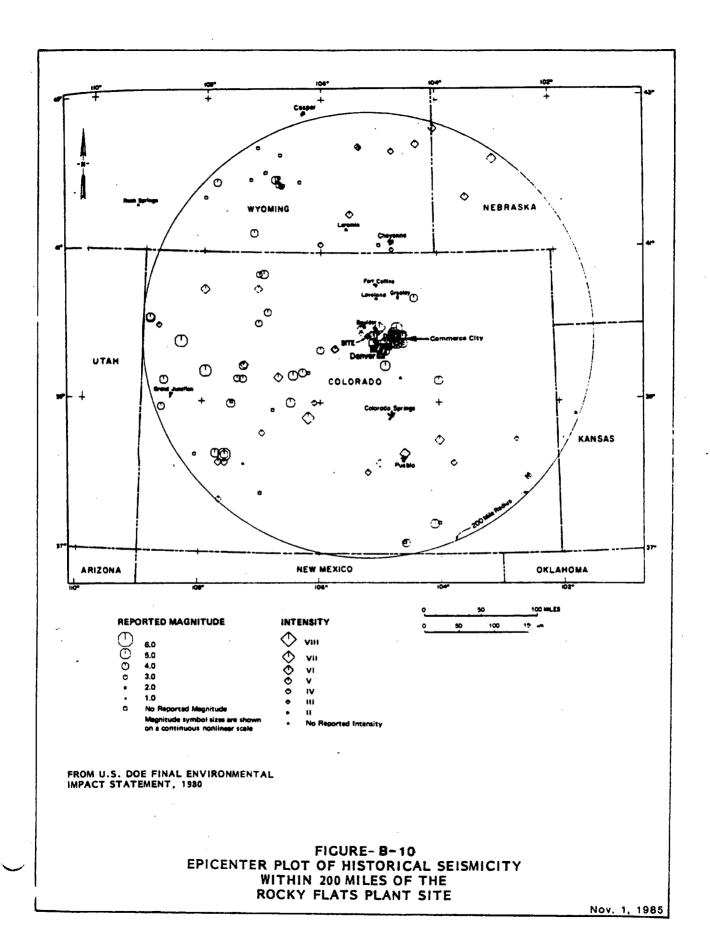
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The majority of the displacement on the Golden Fault, the uplift of the Front Range, and subsidence of the Denver Basin occurred during the late Cretaceous to early Eocene Laramide Orogeny about 40 to 70 million years ago. Erosion during the Laramide Orogeny is believed to have kept pace with uplift and the Front Range probably never stood very high above the Denver Basin during the Orogeny. By the late Eocene an erosional surface of low relief covered much of the Rocky Mountain Region.

The present rugged topography to the west of the Rocky Flats Plant site is the result of Post-Laramide tectonics and erosion. About 5,000 to 10,000 feet of uplift has taken place in the Rocky Mountain Region since the early Miocene about 25 million years ago. Late Tertiary block faulting is believed to have accompanied the regional uplift as indicated by apparent displacements of the late Eocene erosional surface (Scott, 1975, Epis and Chapin, 1975). There is some evidence that block faulting has continued into the Quaternary (Scott, 1970, Whitkind, 1976, and Kirkham and Rogers, 1981).

B-3a(2) Historic Seismicity

Historically, seismicity in Colorado has been relatively low. The first reported earthquake occurred in 1870. Of the earthquakes recorded during the historical period, only three with Modified Mercalli intensities greater than VI have occurred within 200 miles of the Plant site. These larger earthquakes were reported on



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November 8, 1882, November 15, 1901, and August 9, 1967. Figure B-10 shows historical earthquakes that have occurred within 200 miles of the Rocky Flats Plant.

A great deal of speculation has been centered about the location and size of the November 8, 1882 earthquake. Hadsell (1968) assigned an intensity VII to the 1882 earthquake and placed the epicenter north of Denver about 13 miles northeast of the Rocky Flats Plant site. Earlier studies reported the epicenter near Vail Pass about 100 miles west of the Rocky Flats Plant site. Re-examination of available historic data by Dames and Moore (1981), which relied primarily on newspaper accounts, was done in an attempt to better understand the 1882 earthquake. The Dames and Moore study suggests a tentative epicenter in northwestern Colorado about 170 miles northwest of the Rocky Flats Plant site and assigned a local magnitude range of 6.0 to 7.0 to the 1882 earthquake which would correspond to a epicentral intensity of about VII-VIII. The 1882 earthquake caused intensity VI-VII ground shaking in the Denver area which is similar to the ground shaking caused by the August 9, 1967 Derby earthquake discussed below.

On November 15, 1901, a strong earthquake was reported near Buena Vista, Colorado. This earthquake was located about 90 miles southwest of the Rocky Flats Plant site and had a epicentral intensity of VI-VII.

From April 1962 through June 1972, over 1,800 earthquakes occurred in the Derby area about 30 miles east of the Rocky Plats Plant site. The Derby earthquakes were near a deep waste disposal well on the Rocky Mountain Arsenal. The earthquake activities started soon after initiation of pumping in the disposal well. Subsequent investigations of the Derby earthquake sequence supports the hypothesis that the earthquakes resulted from the release of natural tectonic stresses by increases in hydrostatic fluid pressures as a result of pumping (Healy and others, 1966; Major and Simon, 1968; and Hsieh and Bredehoeft, 1981). The largest Derby earthquakes, with magnitudes greater than 5.0, occurred about one and one-half years after the pumping stopped in February 1966. After 1967, the number of Derby earthquakes has declined and the present indication is that the swarm of activity that occurred between 1962 and 1967 has virtually disappeared (Hsieh and Bredehoeft, 1981). The largest earthquake in the Derby swarm had a local magnitude of 5.3 and occurred on August 9, 1967. The epicenter of this earthquake was located about 26 miles east of the Rocky Flats Plant site. This earthquake resulted in intensity VI-VII ground shaking in the epicentral region and intensity VI ground shaking occurred at the Rocky Flats Plant site.

B-3a(3) Quarternary Faulting

In 1981, extensive studies were done to evaluate the Quarternary history of the Golden Fault and other faults at the Rocky Flats Plant site and vicinity (Dames and Moore, 1981).

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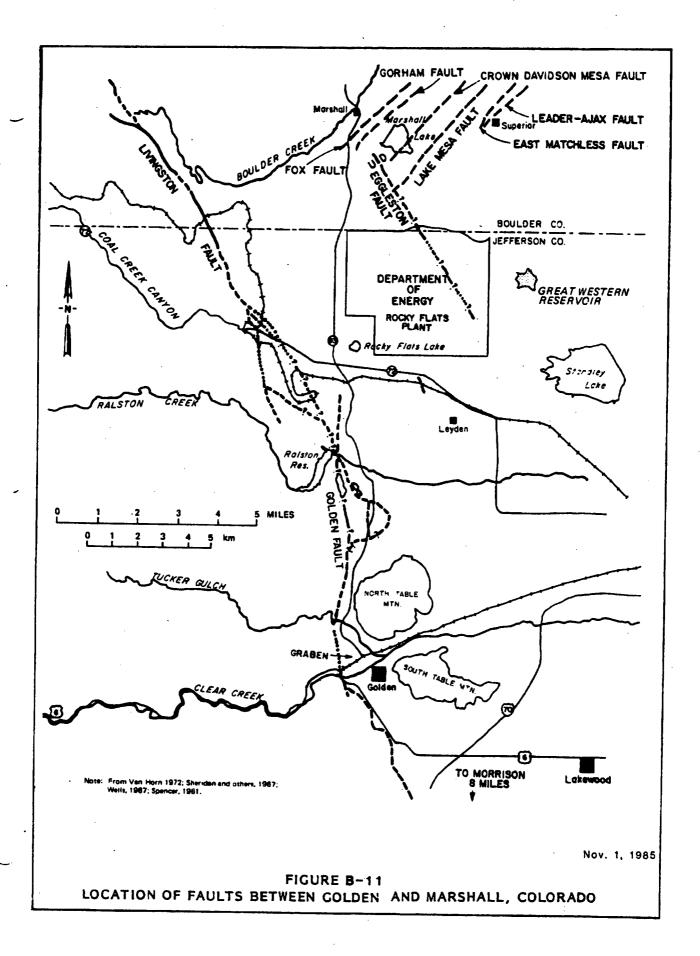
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The Golden Fault studies did not produce any compelling evidence of tectonic activity along the Golden Fault with in the past 500,000 years and the fault does not have surficial expressions characteristic of geologically young fault zones. Some of the exploratory trenches encountered anomalous "tongues" of bedrock extending into the overlying alluvium along the fault zone. The mechanisms responsible for the bedrock "tongues" has not been clearly established. Both tectonic and nontectonic processes have been proposed; however, regardless of their origin, the bedrock "tongues" certainly appear to have been produced by processes associated with very slow rates of deformation (Dames and Moore, 1981).

A graben structure is located north of Golden and about 800 feet to the east of the Golden Fault. The Colorado Geological Survey studied the graben in 1976 and concluded that the graben is part of the Golden Fault structural zone and is characterized by at least two episodes of fault movement since the Yarmouth or within the last 600,000 years (Kirkham and Rogers, 1981). Dames and Moore (1981) performed extensive studies of the graben but were unable to develop sufficient evidence to conclusively determine if the graben is the result of tectonic or nontectonic processes. Based on the overall study of the Golden Fault, that it is unlikely that the graben is tectonically or structurally related to the Golden Fault, and in their judgement, the graben was more likely formed in response to nontectonic processes.

The northwest trending Eggleston fault, mapped by Spencer (1981) to one mile south of the Eggleston Reservoir, located approximately three miles north-northwest of the Rocky Flats Plant site, was later given a different orientation by Hurr (1976). Hurr believed the fault trended more to the northwest and passed 1/2 mile east of the Plant site (see Figure B-11). This was based on 1975 and 1976 field investigations by Hurr when three features, suggestive of possible fault control, aligning in a northwesterly direction with the Eggleston fault were identified. These features are No. 1, 2 and 6 (shown in Figure B-12).

Feature No. 1, located south of holding ponds B-3 and B-4, shows displacement of bedrock units in a deeply eroded drainage channel on South Walnut Creek. Dames and Moore's 1980 investigation showed no evidence of lateral continuation of the displacement. Excavation studies in 1980 revealed bedrock displacements, but a noted downward decrease in dip of the fault plane suggested a possible landslide origin.



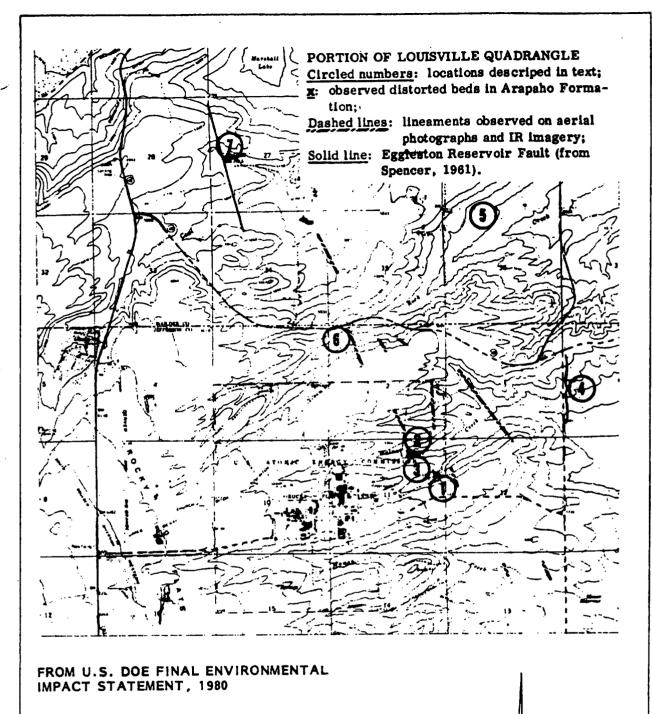


FIGURE B-12 POTENTIAL FAULT FEATURES NEAR ROCKY FLATS

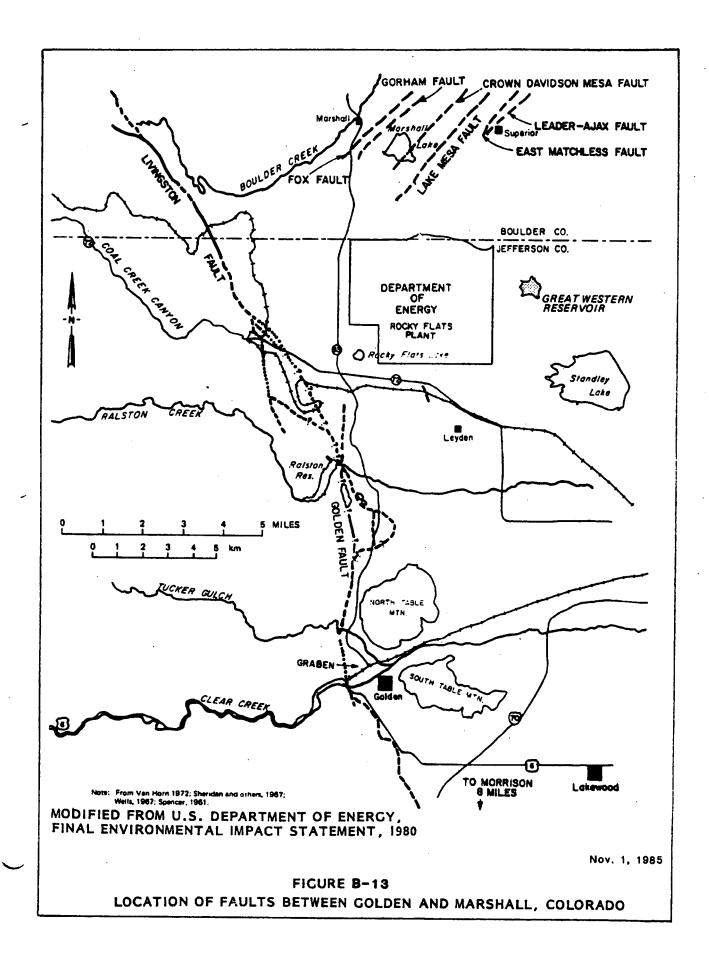
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Nov. 1, 1985

Feature No. 2 is located north of holding pond A-2 on the main fork of Walnut Creek. The 1980 investigation found no evidence of displacement and concluded that faulted blocks do not exist.

The area around Eggleston Reservoir (Feature 7 on Figure B-12) was investigated in 1980 to determine if a fault existed in the vicinity of the reservoir. The results of mapping, trenching and auger boring did not reveal any displacements or disturbances in the area. Therefore, this study concluded the Eggleston fault does not exist (see Figure B-13) as earlier believed.

A photo lineament study in 1981 found only one lineament suggestive of having possible fault control. Field investigations revealed this feature as erosional in origin, not fault related. A previous aerial photography study by EG&G in 1980 showed an east-west trending linear feature just north of pond A-2 (see Feature 3 in Figure B-12). On investigation of the area EG&G concluded the linear feature was probably the result of changes in ground moisture and vegetation in the area.



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The geomorphic features suggestive of possible fault control that Dames and Moore (1981) investigated were:

- A bedrock step near Rocky Flats Lake located 1.3 miles southwest of the Plant site. It was found that relief on the bedrock surface was erosional and not related to shear zone faulting.
- 2. The Denver and Rio Grande Railroad cut south of the Plant was found to be an old infilled channel and not a northnorthwest trending fault.
- 3. Tilted bedrock overlain by quaternary gravels at McCaslin Boulevard, north of the Plant, is the result of gravity faulting along a landslide slip plane.

None of the features noted above that were investigated in the extensive study discussed in this subsection are considered to present a seismic hazard to the Rocky Flats Plant.

B-3b Flood Plain Standard

Documentation, including the source, has been provided in subsection B-2a, indicating that no hazardous waste management facilities are located within a 100-year flood plain.

B-4 Traffic Patterns (40 CFR 270.14(b)(10))

Access to the site is from Indiana Street and Colorado Route 93. Most vehicle traffic proceeds to Indiana Street via Colorado Routes 123 or 72 (see Figure B-1).

Traffic Control: Traffic controls for all vehicles entering the site are stringent. All vehicles are subject to search and must have a vehicle permit before they are allowed to enter the site. Applicable portions of the traffic regulations for Rocky Flats are shown in Table B-2.

Road Surfacing: All roads are surfaced to handle any type of traffic or vehicle load (heavy construction equipment, automobiles, etc.) that can be reasonably expected.

TABLE B-2. Traffic Regulations

- 1. All personnel vehicles entering the plant site shall display the Rockwell vehicle permit in the area of the windshield on the driver's side in such a manner that it may be viewed from the outside.
 - All operators shall display the vehicle permit when entering.
 - All parked vehicles shall have their vehicle permit displayed in such a manner to be viewed from the outside.
 - Operators who drive different vehicles to work must transfer the permit to the vehicle they plan to drive.
 - If an operator has forgotten his vehicle permit, he must pull over to the parking area outside the main gates and obtain a temporary permit. Upon exiting the plant, he must stop and return the numbered temporary permit to a security inspector.
 - Motorcycle operators are subject to the same regulations.

 They shall have the permit located in a visible location on the front of the vehicle.
- Operators will operate their vehicles in accordance with the State of Colorado traffic rules and regulations.

TABLE B-2 CONTINUED

- 3. Reserved parking spaces will only be used by the assigned individual or group: Vanpool, off-site visitor, handicap, Plant Protection, government vehicle, DOE vehicle, etc. These reserved parking spaces are reserved at all times.
- 4. All employees shall park in designated lots and spaces only.

 Designated lots are those shown on the attached map.
- 5. Vehicle operators shall drive in the indicated direction only on one-way aisles and park with the front of the vehicle facing inward in angle parking spaces.
- 6. Motorcycles will park in designated motorcycle areas or vehicle spaces only.
- 7. No parking in established vehicle pick-up areas.
- 8. No parking in designated construction areas.
- Operators shall yield the right-of-way to pedestrians and to any emergency vehicle (ambulance, Fire Department, Plant Protection, etc.) if that vehicle is sounding a siren and/or displaying an emergency light.
- 10. Operators are reminded of the reverse traffic flow on the East Access Road, Central Avenue, and the West Access Road. At certain times of the day, the direction of the center lane reverses to handle the volume of traffic.

TABLE B-2 CONTINUED

- The center lane on the East Access Road and Central Avenue is open to westbound traffic except during the time frame of 3:00 p.m. to 4:30 p.m. During this time frame, the center lane is open to eastbound traffic only. Operators are not allowed to pass using the oncoming lane of traffic.
- The center lane on the West Access Road is open to east-bound traffic <u>except</u> during the time frame of 3:00 p.m. to 4:30 p.m. During this time frame, the center lane is open to westbound traffic only. Operators are not allowed to pass using the oncoming lane.
- 11. Vehicles that are illegally parked are subject to being towed to the parking lot outside the East Gate.
- 12. Plant Protection is the designated organization for plant traffic control and enforcement of traffic rules and regulations. Employees shall obey all posted traffic regulations, speed limits, and any traffic directions given by Plant Protection personnel.
- 13. Employee Relations and appropriate supervision are responsible for administering discipline to Rockwell personnel who disobey traffic regulations.

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Estimated Volume: A typical traffic count is:

	East Gate	West Gate	
Rush Hour	2,000	850	
Total for Day	3,530	1,275	

There are about 850 shipments by truck of chemicals and routine materials to and from the Rocky Flats Plant each year.

References

Davis, T.L., 1980, "Rocky Flats Reflection Seismic Project." In: U.S. Department of Energy, Final Environmental Impact Statement, Vol. 2, Appendix C-2.

Lackey, J. G., Jones, E. B., and Wollenberg, H. A., 1980. "Summary of Non-Nuclear Remote Sensing at the Rocky Flats Site and Status of Analysis of Geological and Hydrological Indicators." In: U.S. Department of Energy, Final Environmental Impact Statement, Vol. 2, Appendix C-1.

U.S. Department of Energy, 1980. Final Environmental Impact Statement, Vols. 1 and 2.

U.S. Department of Energy 1981. "Geological and Siesmological Investigations of Rocky Flats", by Dames and Moore.

Date: November 1, 1985

Revision No.: 0

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SECTION C

WASTE CHARACTERISTICS AND WASTE ANALYSIS PLAN

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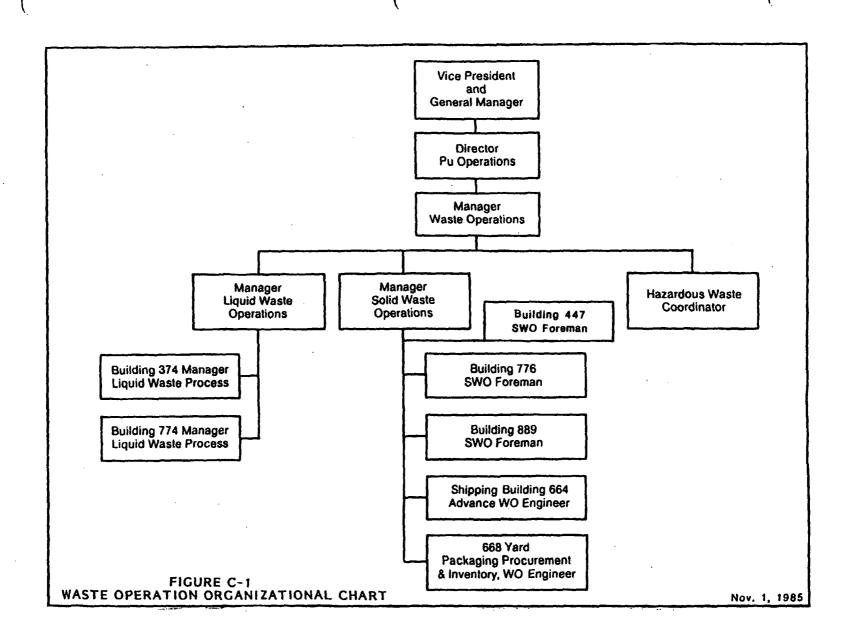
SECTION C

WASTE CHARACTERISTICS AND WASTE ANALYSIS PLAN

C-1 <u>Chemical and Physical Analysis</u> (40 CFR 270.14(b)(2); CHWR 100.41(a)(2))

This section describes the chemical and physical nature of the hazardous wastes stored at Rocky Flats facility. The Rocky Flats Plant is operated by Rockwell International, North American Space Operations, for the United States Department of Energy. All plant activities including waste management are funded by the Department of Energy (DOE) and are managed by Rockwell International. The anticipated hazardous wastes that will be generated at the Plant and their estimated maximum quantities are listed in the Part A application and discussed further in this section and the operational narrative (Section D).

The Rockwell Waste Operations Department is responsible for waste management at the Rocky Flats Plant. The organizational structure of the Waste Operations Department is illustrated in Figure C-1. The Manager of Waste Operations reports to the Director of Plutonium Operations and is responsible for the overall management of hazardous wastes generated at Rocky Flats. Managers of two subgroups, Liquid Waste Operations and Solid Waste Operations, and the Hazardous Waste Coordinator report to the Manager of Waste Operations.



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The primary mission of the Rocky Flats Plant is to produce components for nuclear weapons. The Plant's secondary mission is to provide support to 1) the fabricating mission by operating facilities for the recovery of plutonium, waste treatment and disposal, chemical laboratories, and research and development, and 2) special support operations for other DOE facilities. In performing these operations, waste materials are generated that may be hazardous and regulated under RCRA regulations.

Hazardous wastes typically generated at the Rocky Flats Plant are usually not part of a continuing process waste stream. Exceptions to this are oil, paint, paint solvents, silver recovery solutions, ECM sludges and halogenated organic solvents. Hazardous wastes which have met the criteria for off-site disposal are generally stored in 55-gallon drums that are placed in modified cargo containers and separated with regard to waste compatibility until they are transferred off-site for disposition. Hazardous wastes are recycled whenever it is practical to do so. Shipment to an approved treatment, storage, and disposal (TSD) facility is the second option for disposal.

The Hazardous Waste Coordinator is notified of the need to dispose of a hazardous waste when the waste generator completes a Waste Processing Request (WPR) form (see Figure C-2). This form is reviewed by the Hazardous Waste Coordinator and Environmental Analysis and Control Section (EA&C) personnel to determine the appropriate disposal method. The waste is sampled and a fingerprint analysis is made to check consistency with the information reported on the WPR form. When all analytical data have been received, a copy of the WPR form is returned to the waste generator with disposal instructions.

		DATE:
NAME:	ORGAN	ZATION
PIIONE:	BUILD	ING & ROOM NO.
Where applicable, please description information	check the appropriate box including toxic and fire b	kes, identify, and enter nazards.
SOLID 🔲 WEIGHT, Kg (lbs)LIQUID	VOLUME, LITER (gal)
ACID NEUTRAL	BASE	ANALYTICAL REQ. NO. (Attach copy of results)
DESCRIPTION: (Attach she	et if additional space is	required)
		_; gramselement
		NMC Doc. No.
quipment No.		
RADIATION MONITORING SURV	EY RESULTS:	
Direct	Smear0	amma Radiation
Signature_		Date
DISPOSITION OF WASTE:		
A. RADIOACTIVE WASTE		
Send to Building	No Attention of	
Approved by Wast	e Operations	Date
B. NONRADIOACTIVE,	NONHAZARDOUS, NONROUTINE	WASTES
Send to Landfill	•	
Approved by Envi	ronmental Analysis	Date
C. NONRADIOACTIVE N	AZARDOUS WASTES	
	AZARDOUS WASTES No Attention of	
,	No Attention of	Date
Send to Building	No Attention of	

Table C-1 lists hazardous wastes by EPA ID number according to their method of present or planned management at the site. Detailed analyses will be provided where applicable.

Table C-2 lists the hazardous waste managed during 1985. The volumes listed under the "Yearly Volumes Generated" column were transferred to Waste Operations during the year.

Hazardous waste at Rocky Flats is generally placed in containerized 55-gallon drums. Containers and labels for transporting hazardous waste are selected by reference to 49 CFR, Section 172.101, Columns 4 and 5. All hazardous waste containers are marked with the information shown in Figure C-3. Policies regarding the on-site transportation of hazardous waste are provided in the On-Site Transportation of Radioactive and Other Hazardous Materials Manual which is discussed in Section D.

A policy to recycle off-site as much hazardous waste as possible is aggressively pursued. The evaluation of recycling methods is a continuous process which is necessary to facilitate recycling of some infrequently received and/or off-specification chemical wastes.

Table C-1

Waste Listing by Hazardous Code and Management Method

Listed below are the wastes that are managed at the Rocky Flats site, followed by each waste's EPA hazard $code^1$. The wastes are contained in drums stored in converted cargo containers as described in Section D.

```
F003, U002
                                       D011
                        I, T
                                                                E, T
F001, U211
                        T
                                       F005, U220
                                                                I, T
                                       F001, U226
F003, U239
F001, U080
                        T
                                                                T
D001, U001
                        I, T
                                                                I, T
D002, D003
                        C, R, T
                                       D001
                                                                I, T
D001
                        E, I, T
                                       D106
                                                                H, T
D009, U151
                        E, T
                                       D005
                                                                E, T
D001, F003, U154
                        I, T
                                       D001
                                                                I, T
D002, D003
                        C, R, T
                                       D002, D003, U134
                                                             - C, R, T
F001
                        Т
                                       D001
                                                                I, T
D002, D003
                        C, R, T
                                       D001
                                                                I, T
D002, D003
                        C, R, T
                                       F001, F002
                                                                T
D002, D003
                        C, R, T
                                       D001, D002, D003,
D002, D003
D001, D002, D003,
                        C, R, T
                                         U135
                                                                I, C, R, T
                                       D002, D003
                                                               C, R, T
  U135
                        I, C, R, T
                                       D003
                                                                R, T
                                       U028
                                                                I, R, T
D007
                        E
```

¹Key: I = Ignitable.

C = Corrosive.

R = Reactive.

E = EP Toxic.

H = Acutely Hazardous.

T = Toxic.

Table C-2

Hazardous Waste Generated, Stored, and Shipped
Off-site for Recycling or Disposal (1985)

Waste	EPA HW Number(s)	Yearly Quantities (Vol.)* (Wt.)**
Acetone	F003, U002	(1,000 gal) (6,588 lbs
Carbon Tetrachloride	F001, U211	(25 gal) (333 lbs
Methylene Chloride (Dichloromethane)	F001, U080	(100 gal) (1,106 lbs
Ethanol	D001, U001	(1,000 gal) (6,583 lbs
Hydrochloric Acid	D002, D003	(50 gal) (500 lbs
Magnesium	D001	(1,395 gal) (3,000 lbs
Mercury	D009, U151	(l gal) (25 lbs
Methanol	D001, F003, U154	(500 gal) (3,300 lbs
Nitric Acid	D002, D003	(5,000 gal) (62,663 lbs
Tetrachloroethylene (Perchloroethylene)	F001	(500 gal) (6,767 lbs
Phosphoric Acid	D002, D003	(500 gal) (7,648 lbs
Sulfuric Acid	D002, D003	(1,000 gal) (15,354 lbs

^{*}Vol. expressed in gal = gallons, L = liters, cu yd = cubic yards. **Wt. expressed in lbs = pounds, Kg = kilograms, M.T. = Metric Tons.

Table C-2 (continued)

Waste	EPA HW Number(s)	Yearly Quantities (Vol.)* (Wt.)**			
Silver	D011	(14,307 L) (108 kg)			
Toluene	F005, U220	(500 gal) (3,615 lbs)			
1,1,1-Trichloroethane	F001, U226	(10,000 gal) (111,673 lbs)			
Xylene	F003, U239	(100 gal) (1,251 lbs)			
Used Oil	D001	(25,000 gal) (175,000 lbs)			
Sodium Cyanide	D106	(2 gal) (30 lbs)			
Barium Chloride	D005	(55 gal) (800 lbs)			
Sodium Nitrate/ Potassium Nitrite	D001	(55 gal) (800 lbs)			
Etchant Solution (Acid)	D002, D003, U134	(6,000 gal) (52,846 lbs)			
Used O & M Paint Solvents/Sludge	D001	(7,000 L) (7.0 MT)			
Waste/Surplus O & M Paint	D001	(1,400 L) (1.4 MT)			
Freon 113	F001, F002	(10,000 gal) (130,521 lbs)			
Bromine Trifluoride	D002, D003	(0.0196 lbs) (2 cu. yd)			
Chlorine Trifluoride	D002, D003	(0.0098 lbs) (1 cu. yd)			

^{*}Vol. expressed in gal = gallons, L = liters, cu yd = cubic yards. **Wt. expressed in lbs = pounds, Kg = kilograms, M.T. = Metric Tons.

Table C-2 (continued)

Waste 	EPA HW Number(s) D001, D002, D003, U135	Yearly Quantities (Vol.)* (Wt.)**		
		(0.0196 lbs) (2 cu. yd)		
HCl and Hydrogen Sulfide Mixture	D001, D002, D003, U135	(0.0098 lbs) (1 cu. yd)		
Iodine Pentafluoride	D002, D003	(0.0196 lbs) (2 cu. yd)		
Tungsten Hexafluoride	D003	(0.0342 lbs) (15 cu. yd)		
Dioctyl Phthalate	U028	(150 gal.) (1232 lbs)		
ECM Sludge	D007	(15,600 gal.) (195,280 lbs)		

^{*}Vol. expressed in gal = gallons, L = liters, cu yd = cubic yards. **Wt. expressed in lbs = pounds, Kg = kilograms, M.T. = Metric Tons.

AZARDOUS NASTE

FEDERAL LAW PROHIBITS IMPROPER DISPOSAL

IF FOUND, CONTACT THE NEAREST POLICE, OR PUBLIC SAFETY AUTHORITY, OR THE U.S. ENVIRONMENTAL PROTECTION AGENCY

PROPER D O T SHIPPING NAME	UN OR NA#
GENERATOR INFORMATION:	
ADDRESS	
CITY	STATE ZIP
EPA ID NO	EPA WASTE NO.
ACCUMULATION START DATE	

HANDLE WITH CARE!
CONTAINS HAZARDOUS OR TOXIC WASTES

Nov. 1, 1985

FIGURE C-3 MARKING INFORMATION FOR HAZARDOUS WASTE CONTAINERS

C-2 Waste Analysis Plan (40 CFR 270.14(b)(3); CHWR 100.41(a)(3)) Rocky Flats' Waste Analysis Plan covers the requirements of 40 CFR 264.13(b). Rocky Flats maintains various levels of waste analysis and quality control to determine the character of wastes and the method of on-site processing and off-site disposal. The generator is initially responsible for determining the hazardous characteristics of waste generated in his operations. Each generator is required to supply a detailed chemical and physical analysis of a representative waste sample. This information is to be provided on a Waste Processing Request (WPR) form (Figure C-2). Examples of waste profile sheets which are used to determine disposition of the wastes upon completion of the WPR are found in Appendix C.1. This form constitutes the basis for the administrative and recordkeeping requirements specified under RCRA. The WPR form, in conjunction with the generator's manifest, represents the principal method for identifying waste for processing.

Adequate physical and chemical analyses are needed to properly and safely store, blend, mix, and treat the wastes prior to off-site transport. The generator sends the WPR form to the Environmental Analysis and Contol Section. On-site wastes are sampled and a fingerprint analysis is made to check consistency with the information reported on the WPR form and the accompanying manifest. A copy of the form is returned to the generator, noting instructions for the proper disposition of the waste. The generator then sends

the waste to the location noted on the form. If additional analytical data are necessary to determine proper disposition, the generator is requested to supply these data prior to shipment.

C-2a Parameters and Rationale for Selection

Rocky Flats generates, on an intermittent basis, the following six categories of waste:

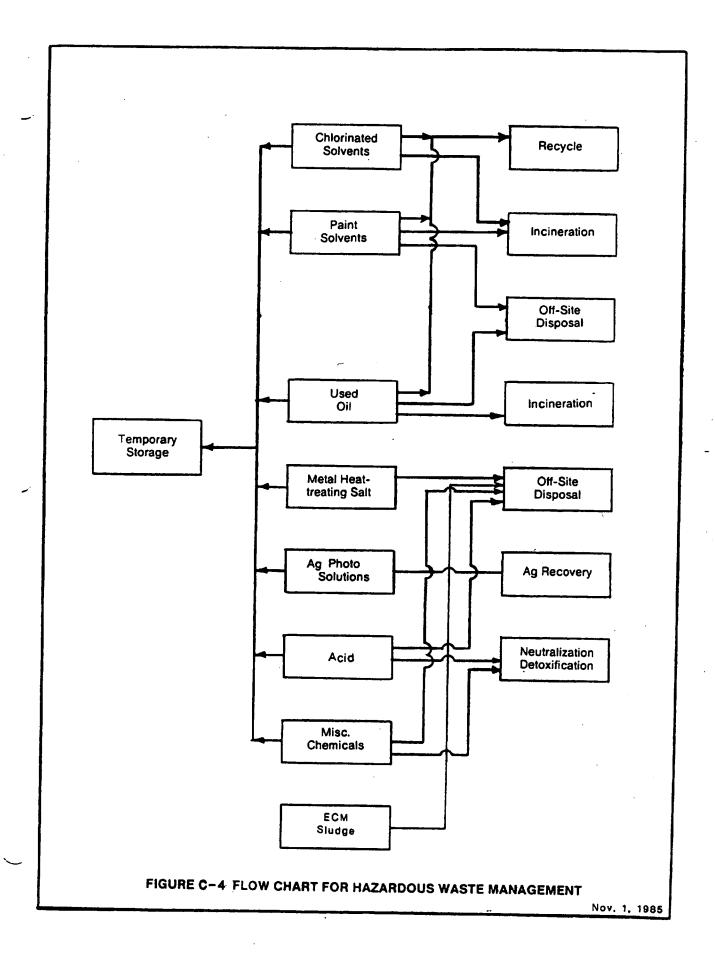
- o <u>Ignitable</u> (I) -- Waste solvents.
- Corrosive (C) -- Acids and bases.
- o Reactive (R) -- Reactive gases, acids, and miscellaneous laboratory wastes.
- o EP Toxic (E) -- Wastes contaminated with heavy metals or organic compounds that can leach under simulated landfill conditions.
- o <u>Toxic</u> (T) -- Specific listed hazardous wastes.
- O Acutely Hazardous (H) -- Cyanide and other EPA listed
 "P" wastes.

The wastes are managed by the following processes:

- O Containerize -- I, C, R, E, T, H.
- o Recycling -- I, T.
- o Incinerate (Future) -- I, R, E, T, H.
- o Disposal Off-site -- I, C, R, E, T, H.

Wastes are containerized on-site in drums which are stored in converted, modified cargo containers. Depending on waste characterization, wastes are temporarily stored and/or treated prior to off-site transport and reclamation or disposal. The waste management processes are discussed in Section D. Wastes that are transported off-site are accompanied by a manifest. The WPR form and concomitant on-site sampling determine processing and final disposition of wastes.

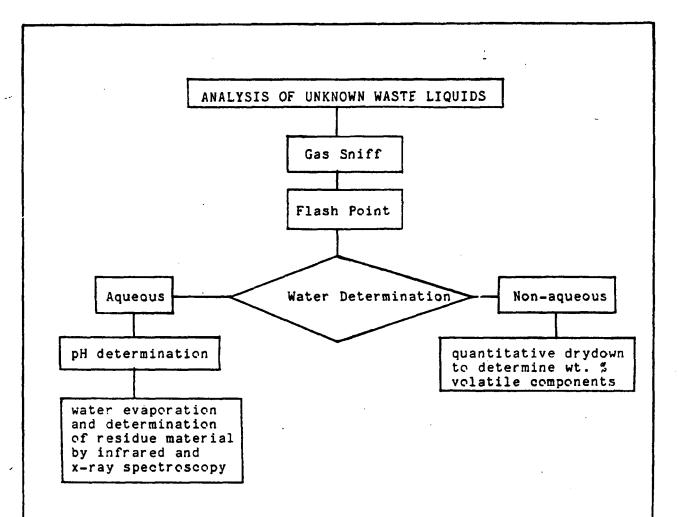
Hazardous wastes are not disposed of at the Plant. Instead, they are reused, commercially recycled, or shipped off-site for disposal. Figure C-4 shows disposal pathways for hazardous waste.



As noted in Tables C-1 and C-2, the largest volume of hazardous wastes at Rocky Flats are composed of oil, acid, paint, paint solvent, ECM sludge, and halogenated hydrocarbon solvents. Remaining materials constitute a very small percentage of the total hazardous waste volume. Spent hydrocarbon solvent wastes, and paint and paint solvent wastes are recycled by commercial contractors. Those wastes that cannot be recycled are processed and disposed of off-site at EPA-permitted disposal facilities. All hazardous wastes held onsite awaiting disposal are kept in RCRA-approved storage facilities.

C-2b Test Methods and Frequency of Analysis

It is Rocky Flats policy that all waste generators utilize and all on-site laboratory analyses conform to approved analytical test methods as described in 40 CFR 261, Appendices I, II, and III (see Appendix C-2); U.S. EPA's "Test Methods for Evaluating Solid Waste, Physical and Chemical Methods," SW-846; or other EPA-approved methods. When fingerprint screening tests are used (see Figure C-5), these test methods follow accepted EPA, State, ASTM, or analytical equipment manufacturer procedures.



Gas Sniff: to determine presence of chlorinated solvents and

other volatile components by comparing the vapor's infrared spectrum with standard reference spectra.

Flash Point: of homogeneously mixed sample is determined using

ASTM method D93-80, see attached sheets.

Water Determination: sample layer(s) are tested with water

sensitive indicator paper, Watesmor

Nov. 1, 1985

FIGURE C-5

FINGERPRINT SCREENING TESTS ROCKY FLATS PLANT

Rocky Flats' analytical laboratory is equipped so that constituents can be analyzed by the EPA, ASTM, or equivalent method. Typical waste constituents and analytical methods are listed in Table C-3.

The laboratory has atomic absorption and gas chromatographic capabilities which allow the detection of trace metals and selected organic constituents. Compatibility testing for blending or solidifying wastes is performed in the on-site laboratory.

A summary of sampling procedures and laboratory tests/analysis performed at Rocky Flats to fingerprint hazardous wastes are summarized below.

C-2b(1) Sampling Procedures

.1 SOLIDS

A representative sample will be taken by one of three techniques as deemed appropriate for the material being sampled.

- .1.1 Powders may be mechanically mixed to homogenized the material prior to sampling.
- .1.2 A "thief" (tube) may be used to remove a sample from the entire depth of the material.
- .1.3 Chunks of material may be removed from the top, middle and bottom sections of waste, then crushed and homogenized prior to taking a smaller sample.

Table C-3

Typical Waste Constituents and Analytical Methods

Parameter	Method 1
Physical Properties	
Color Colorimetric, ADMI Colorimetric, platinum-cobalt Spectrophotometric	Method 110.1 Method 110.2 Method 110.3
pH Electrometric	Method 150.1
Residue, nonfilterable and volatile	Method 160.2
Temperature Thermometric	Method 170.1
Turbidity Nephelometric	Method 180.1

¹U.S. EPA, "Methods for Chemical Analysis of Water and Wastes," EPA-600/4-79-020, Environmental Monitoring and Support Laboratory, Cincinnati, Ohio, March 1983, unless otherwise indicated.

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Table C-3 (continued)

Parameter	Method ¹
Physical Properties (continued)	
Heat value (Btu) Oxygen bomb colorimeter	ASTM D240
Ignitability, flash point	ASTM D-93-80
Metals	
Atomic absorption methods	Method 200.0
Arsenic AA, furnace AA, hydride Spectrophotometric, SDDC Digestion method for hydride and SDDC	Method 206.2 Method 206.3 Method 206.4 Method 206.5

1U.S. EPA, "Methods for Chemical Analysis of Water and Wastes," EPA-600/4-79-020, Environmental Monitoring and Support Laboratory, Cincinnati, Ohio, March 1983, unless otherwise indicated.

Parameter	Method ¹
<u>Metals</u> (continued)	
Barium AA, direct aspiration	Method 208.1
Cadmium AA, direct aspiration	Method 213.1
Chromium AA, direct aspiration	Method 218.1
Copper AA, direct aspiration	Method 220.1
Iron AA, direct aspiration	Method 236.1

¹U.S. EPA, "Methods for Chemical Analysis of Water and Wastes," EPA-600/4-79-020, Environmental Monitoring and Support Laboratory, Cincinnati, Ohio, March 1983, unless otherwise indicated.

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Parameter	Method ¹	
Metals (continued)		
Lead		
AA, direct aspiration	Method 239.1	
Mercury		
Cold vapor, manual	Method 245.1	
Cold vapor, automated	Method 245.2	
Cold vapor, sediments	Method 245.5	
Selenium		
AA, hydride	Method 270.0	
furnace	Method 270.2	
Tin		
AA, direct aspiration	Method 282.1	

¹U.S. EPA, "Methods for Chemical Analysis of Water and Wastes," EPA-600/4-79-020, Environmental Monitoring and Support Laboratory, Cincinnati, Ohio, March 1983, unless otherwise indicated.

Parameter	${\tt Method}^{1}$
Metals (continued)	· · · · · · · · · · · · · · · · · · ·
Zinc	
AA, direct aspiration	Method 289.1
Inorganic, Nonmetals	
Acidity	
Titrametric	Method 305.1
Alkalinity	
Titrametric (pH 4.5)	Method 310.1
Colorimetric, automated methyl orange	Method 310.2
Chloride	
Colorimetric, automated ferricyanide, AA I	Method 325.1
Colorimetric, automated ferricyanide, AA II	Method 325.2

U.S. EPA, "Methods for Chemical Analysis of Water and Wastes," EPA-600/4-79-020, Environmental Monitoring and Support Laboratory, Cincinnati, Ohio, March 1983, unless otherwise indicated.

Parameter		Method ¹	
Inorganic, Nonmetals (continued)			
Titrametric, mercuric nitrate	Method	325.3	
Cyanide - Specific ion electrode			
Amenable to chlorination			
Titrametric, spectrophotometric	Method	335.1	
Total			
Titrametric, spectrophotometric	Method	335.2	
Colorimetric, automated UV	Method	335.3	
Fluoride - Specific ion electrode			
Colorimetric, SPADNS with Bellack			
distillation	Method	340.1	
Potentiometric, ion selective electrode	Method		
Colorimetric, automated complexone	Method		

¹U.S. EPA, "Methods for Chemical Analysis of Water and Wastes," EPA-600/4-79-020, Environmental Monitoring and Support Laboratory, Cincinnati, Ohio, March 1983, unless otherwise indicated.

Parameter	Method1
Inorganic, Nonmetals (continued)	
Nitrogen	
Kjeldahl, total	
Colorimetric, automated phenate	Method 351.1
Colorimetric, semi-automated	
block digester AA II	Method 351.2
Colorimetric; titrametric; potentiometric	Method 351.3
Potentiometric, ion selective electrode	Method 351.4
Nitrate	
Colorimetric, brucine	Method 352.1
Nitrate-nitrite	
Colorimetric, automated hydrazine	
reduction	Method 353.1
Colorimetric, automated cadmium reduction	Method 353.2

¹U.S. EPA, "Methods for Chemical Analysis of Water and Wastes," EPA-600/4-79-020, Environmental Monitoring and Support Laboratory, Cincinnati, Ohio, March 1983, unless otherwise indicated.

Parameter	Method ¹	
Inorganic, Nonmetals (continued)		
Colorimetric, manual cadmium reduction	Method 353.3	
Nitrite Spectrophotometric	Method 354.1	
Oxygen, dissolved Membrane electrode Modified Winkler (full bottle technique)	Method 360.1 Method 360.2	
Phosphorus All forms		
Colorimetric, automated, ascorbic acid Colorimetric, ascorbic acid,	Method 365.1	
single reagent	Method 365.2	

¹U.S. EPA, "Methods for Chemical Analysis of Water and Wastes," EPA-600/4-79-020, Environmental Monitoring and Support Laboratory, Cincinnati, Ohio, March 1983, unless otherwise indicated.

Parameter	Method ¹	
Inorganic, Nonmetals (continued)		
Colorimetric, ascorbic acid, two reagent Total	Method 365.3	
Colorimetric, automated, block digestor AA II	Method 365.4	
Silica, dissolved Colorimetric	Method 370.1	
Sulfate Colorimetric, automated chloranilate Colorimetric, automated methyl thymol blue	Method 375.1	
AA II Gravimetric Turbidimetric	Method 375.2 Method 375.3 Method 375.4	

¹U.S. EPA, "Methods for Chemical Analysis of Water and Wastes," EPA-600/4-79-020, Environmental Monitoring and Support Laboratory, Cincinnati, Ohio, March 1983, unless otherwise indicated.

Parameter	Metho	od 1
Inorganic, Nonmetals (continued)		
Sulfide - Specific ion electrode Titrametric, iodine Colorimetric, methylene blue	Method Method	
Sulfite Titrametric	Method	377.1
Organics		
Biochemical oxygen demand BOD (5 day, 20°C)	Method	405.1
Chemical oxygen demand Titrametric, mid-level Titrametric, low level	Method Method	

¹U.S. EPA, "Methods for Chemical Analysis of Water and Wastes," EPA-600/4-79-020, Environmental Monitoring and Support Laboratory, Cincinnati, Ohio, March 1983, unless otherwise indicated.

Parameter	Method ¹
Organics (continued)	
Titrametric, high level for saline waters Colorimetric, automated; manual	Method 410.3 Method 410.4
Oil and grease, total recoverable Gravimetric, separatory funnel extraction Spectrophotometric, infrared	Method 413.1 Method 413.2
Organic carbon, total Standard Combustion or oxidation	Methods 505 ² Method 415.1
Petroleum hydrocarbons, total recoverable Spectrophotometric, infrared	Method 418.1

¹U.S. EPA, "Methods for Chemical Analysis of Water and Wastes," EPA-600/4-79-020, Environmental Monitoring and Support Laboratory, Cincinnati, Ohio, March 1983, unless otherwise indicated.

 $^{^2}$ Standard Methods for Water and Wastewater Analyses, 15th Edition.

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Parameter	Method ¹
Organics (continued)	
Phenolics, total recoverable Spectrophotometric, manual 4-AAP with distillation Colorimetric, automated 4-AAP with distillation	Method 420.1
Spectrophotometric, MBTH with distillation	Method 420.3
Methylene blue active substances (MBAS) Colorimetric	Method 425.1
NTA Colorimetric Colorimetric, automated, zinc-zincon	Method 430.1 Method 430.2

¹U.S. EPA, "Methods for Chemical Analysis of Water and Wastes," EPA-600/4-79-020, Environmental Monitoring and Support Laboratory, Cincinnati, Ohio, March 1983, unless otherwise indicated.

Table C-3 (continued)

Parameter

Method1

Organics (continued)

PCB

Gas chromatograph

Method 8.082

10.S. EPA, "Methods for Chemical Analysis of Water and Wastes," EPA-600/4-79-020, Environmental Monitoring and Support Laboratory, Cincinnati, Ohio, March 1983, unless otherwise indicated.

²PCB's and other organic chemicals, as Rocky Flats deems appropriate, will be analyzed according to the appropriate gas chromatograph (GC) analytical procedure described in "Test Methods for Evaluating Solid Waste; Physical/Chemical Methods," SW-846, 1982.

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.2 LIQUIDS

A representative sample will be taken by one of two techniques as deemed appropriate for the material being sampled.

- .2.1 A sample may be removed from the container after homogenizing by mechanically mixing the material.
- .2.2 A "thief" (tube) may be used to remove a sample from the entire depth of the material.

.3 GASES

Gas samples are taken using an evacuated sampling bottle.

FREQUENCY OF ANALYSIS

The need for analysis is determined on an individual basis.

C-2b(2) Parameters for Fingerprint Analysis

.1 IGNITABILITY

.1.1 Flash Point

The flash point of organic liquid waste will be established using ASTM D-93-34 (Pensky Martin, Closed Cup) procedure (Petroleum Products and Lubricants, Vol. 1, 1975). Alternately, a known value may be used if the waste has been chemically characterized or is considered a known waste form with an established flash point.

.1.2 Pyrophoric

Waste forms known to contain pyrophoric metal fines or water reactive materials will be considered ignitable and will be treated prior to disposal. Unknown waste forms will be analyzed to establish the chemical composition. The chemical composition will be assessed to establish the ingitability of the waste. In doubtful cases, a sample will be submitted to the analytical laboratory for testing.

.1.3 Ignitable Compressed Gas

Gases known to meet the definition of a flammable compressed gas (given in 49 CFR 173.300) will be classified as a flammable compressed gas. Unknown gases will be sampled and analyzed by mass spectroscopy to establish the gaseous components. Pressure measurements will be made using the appropriate pressure gauge.

.1.4 Oxidizer

A known oxidizer will be classified as an oxidizer. Chemical analysis will be used to identify the presence of an oxidizer in unknown waste samples. Sample dissolution followed by a standard oxidation/reduction titration procedure will be used for this analysis.

.2 CORROSIVITY

Corrosivity of unknown aqueous waste will be established by making pH measurements using Rocky Flats analytical procedure L-1141-A.

.3 REACTIVITY

- .3.1 Reactivity of unknown waste will be established by one or more of the following methods:
 - o A differential thermal analysis
 - o A differential scanning calorimetry analysis
 - O A standard shock test
 - O A chemical identification, followed by a reactivity assessment made on the basis of the chemical composition

.3.2 Water Reactive

Unknown waste sample may be added to water to test reactivity. Temperature, pressure and gas generation are the parameters which are to be measured.

.3.3 Cyanide and sulfide compounds will be identified by chemical analysis when there is reason to suspect the presence of such compounds in the waste.

4. EP TOXICITY

Wastes suspected of containing unknown amounts of heavy metals or insecticides will be subjected to the extraction procedure test as described in 40 CFR 261, Appendix 11.

C-2c Sampling Methods

A designated representative from Rocky Flats obtains a sample from each container of waste to be stored at the facility for processing. All samples are collected in accordance with approved methods specified in EPA's "Samplers and Sampling Procedures for Hazardous Waste Streams" (EPA 600/2-80-018), and "Test Methods for Evaluating Solid Waste, Physical/Chemical Methods" (EPA SW-846).

C-2d Quality Assurance/Quality Control (QA/QC)

The reliability and credibility of analytical laboratory results are established by the inclusion, as an integral part of any analytical procedure, of a program of scheduled replicate analyses and analyses of standard or spiked samples. Rocky Flats maintains the following procedures to monitor the accuracy of on-site analyses:

The precision of analytical results are established as the standard deviation from true values or from the mean of replicate analyses. Accuracy is reported as the percent recovery of a constituent from a sample of known value with a given analytical procedure and analyst.

CODO78343407

Date: November 1, 1985 Revision No.: 0

In addition, the Rocky Flats laboratory participates in EPA and NBS QA/QC audit programs each year.

C-3 Requirements for Wastes Generated Off-site (40 CFR 264.13(c); CHWR 100.41 (a)(3))

Hazardous wastes managed by Rocky Flats are from on-site generators.

D - PROCESS INFORMATION

SECTION D

PROCESS INFORMATION

D-1 Background (40 CFR 270.14, 15, 16, CHWR 100.41(b))

The Rocky Flats Plant is a Government-owned and contractor-operated facility, which is part of a nationwide nuclear weapons production complex. The Plant is operated under the general direction of the DOE Albuquerque Operations Office (ALO). The prime operating contractor, Rockwell International, was selected to succeed Dow Chemical U.S.A., beginning July 1, 1975, as the prime contractor responsible for operating the Rocky Flats Plant. Waste management programs have existed since Plant operations started in 1952. Hazardous wastes generated at the Plant have been segregated for disposal or recycle since the start of operations.

The types of hazardous wastes generated at the Plant have been relatively consistent throughout Plant history. A small percent of the nonsanitary waste generated at Rocky Flats is defined as RCRA hazardous waste. Hazardous wastes are typically generated on a "one time only" basis and are not ordinarily part of a continuing process waste stream. Exceptions to the "one time only" waste generation, shown in Table D-1, are primarily oil, paint, paint solvents, silver recovery solutions, ECM sludge and halogenated organic solvents. Hazardous wastes which have met EPA criteria for off-site disposal are managed in compliance with CDH, and EPA regulations. Analyses of specific wastes are not performed until the waste generator requests the analyses.

The option to recycle hazardous wastes off-site is used whenever practical. Hazardous waste is sent off-site to be recycled. Shipment to an approved treatment, storage, and disposal (TSD) facility is the second option for disposal.

Table D-1

Waste Listing by Hazardous Code and Management Method

Listed below are the wastes that are managed at the Rocky Flats site, followed by each waste's EPA hazard code $^{\rm I}$. The wastes are contained in drums stored in converted cargo containers as described elsewhere in this Section.

```
F003, U002
F001, U211
F001, U080
D001, U001
D002, D003
                              I, T
                                                  D011
                                                                                 E, T
                              T
                                                                                     T
                                                  F005, U220
                                                                                 I,
                              T
                                                  F001, U226
                                                                                 T
                              I, T
                                                 F003, U239
                                                                                 I,
                              C, R, T
                                                 D001
                                                                                 I, T
                              E, I, T
E, T
D001
                                                 D106
                                                                                 H, T
D009, U151
D001, F003, U154
D002, D003
                                                 D005
                                                                                 E, T
                              I, T
                                                 D001
                                                                                 I, T
                              C, R, T
                                                 D002, D003, U134
                                                                                 C, R,
F001
                              T
                                                 D001
                                                                                 I, T
D002, D003
D002, D003
D002, D003
D002, D003
D001, D002, D003,
                              C, R, T
                                                 D001
                                                                                 I, T
                              C, R, T
                                                 F001, F002
                                                                                 T
                              C, R, T
                                                 D001, D002, D003,
                                                    V135
                              C, R, T
                                                                                 I, C, R, T
                                                 D002, D003
                                                                                 C, R, T
   U135
                              I, C, R, T
                                                 D003
                                                                                 R, T
D007
                                                 U028
                                                                                 I, R, T
                              E
```

 1 Key: I = Ignitable.

C = Corrosive.

R = Reactive. E = EP Toxic.

H = Acutely Hazardous.

T = Toxic.

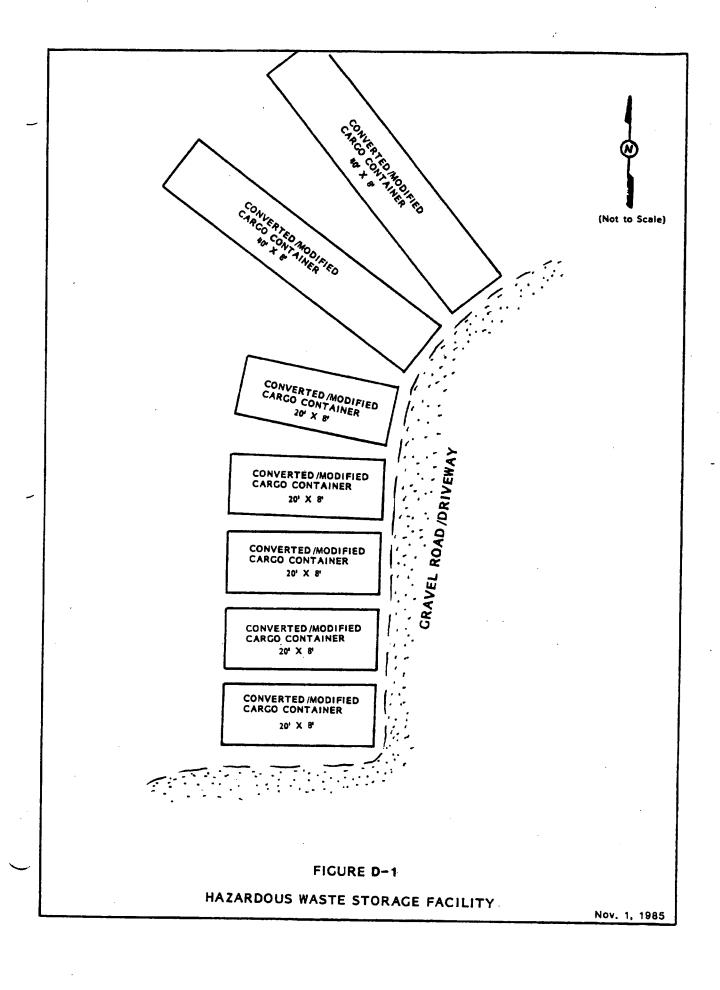
Table D-2 lists the hazardous waste managed during FY 1984. The volumes listed under the "Generated" column were transferred to Waste Operations during the fiscal year.

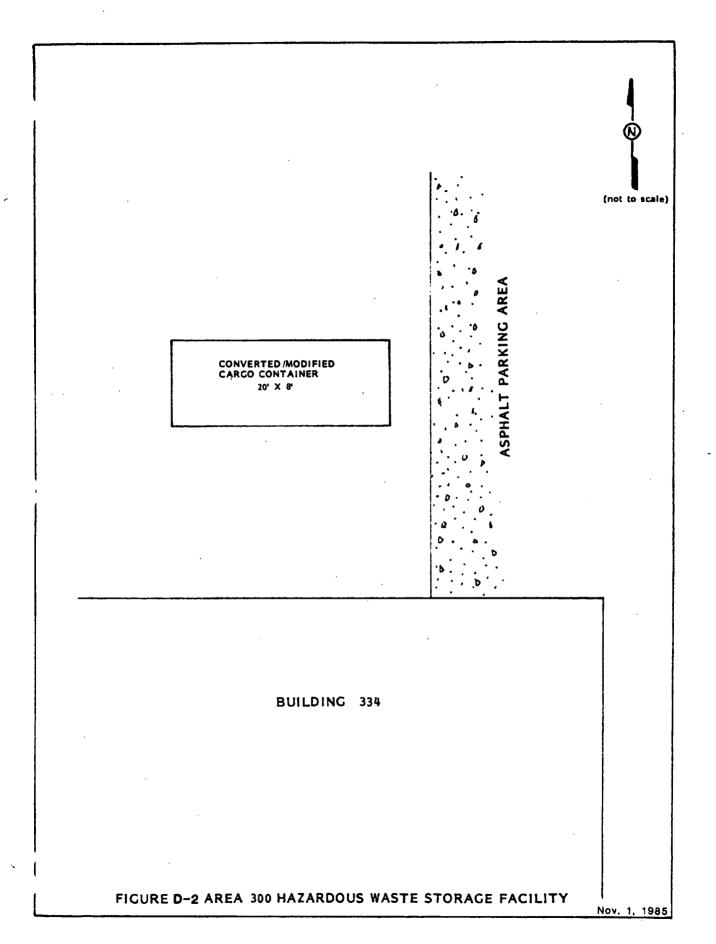
Rockwell International is presently pursuing expansion of their hazardous waste storage facilities at Rocky Flats. Currently they are using eight ventilated, modified cargo containers (Figures D-1 and D-2, and photographs presented earlier in Section A). A steel pan is placed inside each cargo container for spill containment. The drums are stored on rollers inside the steel pans. The volume of the pan is sufficient to contain the contents of all the drums placed in the container. Additionally, a 10-foot X 10-foot galvanized storage shed with a concrete floor is located on the eastern side of the Plant for storage of gas cylinders which have been declared hazardous wastes (Figure D-3)

The status of Rocky Flats' operations is summarized as follows:

- o Existing facilities.
 - Laboratory and receipt control.
 - Modified cargo storage containers (8).
 - Gas container storage shed (1).
 - Fluidized Bed Incinerators (1-pilot, 1-full size).
 - Miscellaneous Chemical Destructions (Bench Scale).
 - Silver Recovery.

- o Planned facilities.
 - Provide additional storage containers on an as needed basis until a permanent container storage facility is constructed.







CORRUGATED METAL EXTERIOR

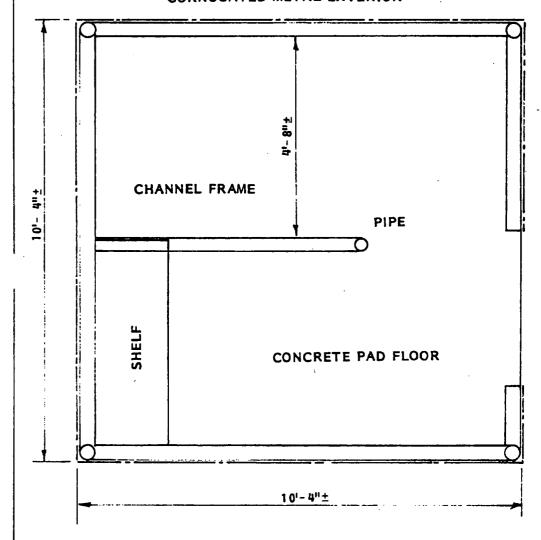


FIGURE D-3
FLOOR PLAN TOXIC GAS SHED , BUILDING 952

Nov. 1, 1985

Table D-2

Hazardous Waste Generated, Stored, and Shipped Off-site for Recycling or Disposal and Yearly Quantities That Are Expected To Be Generated for Each Waste

Waste	EPA HW Number(s)	Yearly Quantities (Vol.)* (Wt.)**
Acetone	F003, U002	(1,000 gal) (6,588 lbs
Carbon Tetrachloride	F001, U211	(25 gal) (333 lbs
Methylene Chloride (Dichloromethane)	F001, U080	(100 gal) (1,106 lbs
Ethanol	D001, U001	(1,000 gal) (6,583 lbs
Hydrochloric Acid	D002, D003	(50 gal) (500 lbs
Magnesium	D001	(1,395 gal) (3,000 lbs
Mercury	D009, U151	(1 gal) (25 lbs
Methanol	D001, F003, U154	(500 gal) (3,300 lbs
Nitric Acid	D002, D003	(5,000 gal) (62,663 lbs
Tetrachloroethylene (Perchloroethylene)	F001	(500 gal) (6,767 lbs
Phosphoric Acid	D002, D003	(500 gal) (7,648 lbs
Sulfuric Acid	D002, D003	(1,000 gal) (15,354 lbs

^{*}Vol. expressed in gal = gallons, L = liters, cu yd = cubic yards.
**Wt. expressed in lbs = pounds, Kg = kilograms, M.T. = Metric Tons.

Table D-2 (continued)

Waste	EPA HW Number(s)	Yearly Quantities (Vol.)* (Wt.)**		
c Silver	D011	(14,307 L) (108 kg)		
Toluene	F005, U220	(500 gal) (3,615 lbs)		
1,1,1-Trichloroethane	F001, U226	(10,000 gal) (111,673 lbs)		
Xylene	F003, U239	(100 gal) (1,251 lbs)		
Used Oil	D001	(25,000 gal) (175,000 lbs)		
Sodium Cyanide	D106	(2 gal) (30 lbs)		
Barium Chloride	D005	(55 gal) (800 lbs)		
Sodium Nitrate/ Potassium Nitrite	D001	(55 gal) (800 lbs)		
Etchant Solution (Acid)	D002, D003, U134	(6,000 gal) (52,846 lbs)		
Used O & M Paint Solvents/Sludge	D001	(7,000 L) (7.0 MT)		
Waste/Surplus O & M Paint	D001	(1,400 L) (1.4 MT)		
Freon 113	F001, F002	(10,000 gal) (130,521 lbs)		
Bromine Trifluoride	D002, D003	(0.0196 lbs) (2 cu yd)		
Chlorine Trifluoride	D002, D003	(0.0098 lbs) (1 cu yd)		

^{*}Vol. expressed in gal = gallons, L = liters, cu yd = cubic yards.

**Wt. expressed in lbs = pounds, Kg = kilograms, M.T. = Metric Tons.

Table D-2 (continued)

Waste	EPA HW Number(s) D001, D002, D003, U135	Yearly Quantities (Vol.)* (Wt.)**	
Hydrogen Sulfide		(0.0196 lbs) (2 cu yd)	
HCl and Hydrogen Sulfide Mixture	D001, D002, D003, U135	(0.0098 lbs) (l cu yd)	
Iodine Pentafluoride	D002, D003	(0.0196 lbs) (2 cu yd)	
Tungsten Hexafluoride	D003	(0.0342 lbs) (15 cu yd)	
Dioctyl Phthalate	U028	(150 gal) (1232 lbs)	
ECM Sludge	D007	(15,600 gal.) (195,280 lbs)	

^{*}Vol. expressed in gal = gallons, L = liters, cu yd = cubic yards.
**Wt. expressed in lbs = pounds, Kg = kilograms, M.T. = Metric Tons.

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Table D-3
Hazardous Waste Generated, Stored, and Shipped
FY 1984

Waste	EPA HW Number	Volumes Generated
Chlorinated Solvents	F001	2,500 liters
Used O&M Paint Solvent/Sludges	D001	7,000 liters
Waste/Surplus O&M Paint	D001	1,250 liters

Table D-4 Projected Hazardous Waste Volumes FY 1985 and FY 1986

Waste	FY	1985	FY 1986
Chlorinated Solvents	2,750	liters	3,025 liters
Used O&M Paint Solvent/Sludges	7,700	liters	8,470 liters
Waste/Surplus O&M Paint	1,375	liters	1,513 liters

Existing facilities are those that are presently operational. Planned facilities are those for which government resources are committed and design is in progress. Planned facilities will be brought on-line as funds permit.

The operation plans for the existing and planned facilities are discussed in the subsections that follow.

As noted previously, Table D-1 lists the types of wastes managed at the Rocky Flats facility. The wastes are listed by EPA hazardous waste code.

Figure D-4 is a process flow chart for all wastes managed at Rocky Flats. The waste types managed at the facility are shown.

D-la Types of Containers

The following types of containers are used at the Rocky Flats facility:

- o DOT 17C (55 gallon) -- Steel.
- o DOT 17E (55 gallon) -- Steel.
- o DOT 17H (55 gallon) -- Steel.
- o Hazardous waste "overpack" drums.

All emptied steel drums are either crushed and sent to a scrap yard or are sent to a drum reclaimer if in good condition (see Appendix D.1 for Procedure For Disposal of Empty Drums).

D-la(1) Container Compatibility and Management

Wastes at the site are shipped in containers by the generator in accordance with Department of Transportation regulations. Wastes are re-containerized by Rocky Flats in "overpack" drums only if a drum is damaged at the facility.

The Rocky Flats waste handling processes do not require opening of drums except during sampling of containers. On-the-job training reaffirms that containers are not to be opened while in storage. Storage facilities are designed to prevent damage to the containers during storage and handling by providing adequate aisle width, and loading and unloading docks that allow free movement of drums. Incompatible wastes are stored in separate storage containers.

D-2 Laboratory and Receipt Control (Existing and Future)

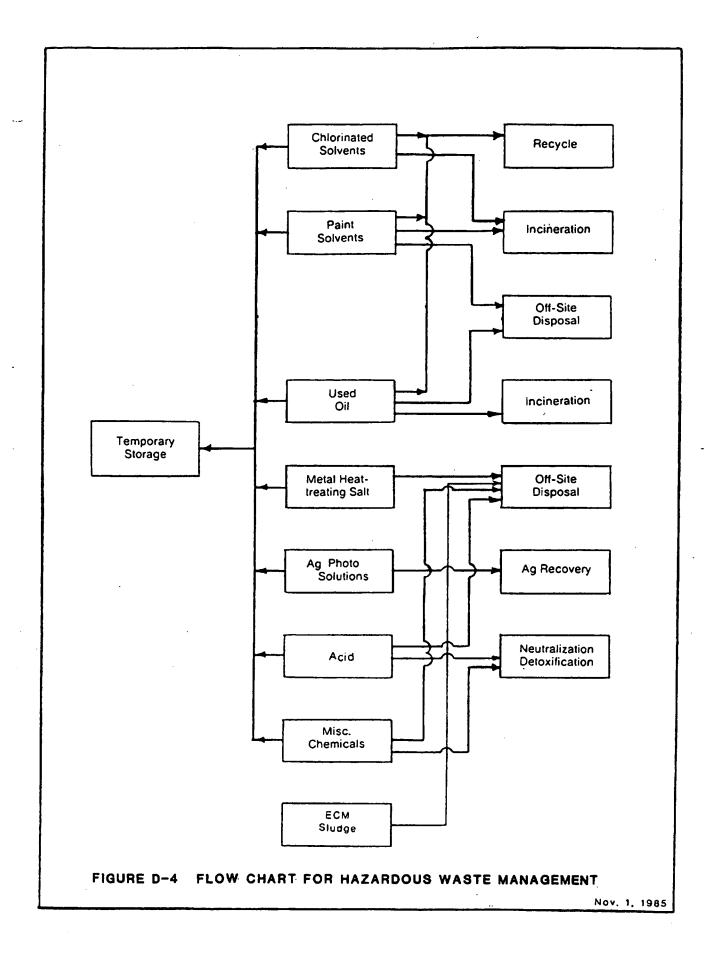
When a known or suspected source of hazardous waste is identified the generator prepares a Waste Processing Request Form. The Hazardous Waste Coordinator then directs the transfer of the waste to an approved on-site storage facility. A sample is taken for analysis to determine final disposition as hazardous or non-hazardous waste.

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D-3 Storage Container (8 Existing) (40 CFR 264.171, 172, 173, 175; CHWR 100.41 (6))

Eight steel cargo containers, of which six measure 20 feet by 8 feet by 8 feet by 8 feet and two measure 40 feet by 8 feet by 8 feet, fitted with air vents, electrical ground, and at least 6-inch deep catch basins are used for storing hazardous waste (see Figure D-1). Halogenated solvents, paints, paint solvents, ECM sludge, silver recovery solvents, and off-specification acids and chemicals are stored in the remote storage area.

One hazardous waste storage container is located near Building 334 (Figure D-2) and is locked when not attended. Seven other hazardous waste storage containers are located north of the main plant complex. The access road and containers are posted "Limited Access" and the cargo containers are locked when unattended. These precautions meet the requirements of 40 CFR 264.14 and CHWR 264.14. Hazardous waste storage locations are shown in Figures D-1 and D-2. Additionally, a gas container storage shed is located on the eastern side of the Plant facilities on a remote site (not near any other facilities). Gases which have been declared wastes are stored in this facility until they are disposed (Figure D-3).



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In practice, drums are segregated by waste type into marked areas. Incompatible wastes are not stored simultaneously in the same storage container. The area is well separated from the secured property boundaries (as well as from other devices) by more than 50 feet, as required by the National Fire Protection Association. Aisle space, maintained by marked areas, is sufficient to allow access by personnel.

In general, two major categories of solvents are managed, namely:

- o Halogenated solvents.
- o Flammable solvents.

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D-4 Treatment Processes (40CFR 264.17; CHWR 264.17)

As noted previously, hazardous wastes generated at the Plant are divided into three types of hazardous material based upon the Federal laws that regulate them: RCRA hazardous waste, TSCA hazardous substances, and NESHAP hazardous substances. Management of each type of hazardous waste is done in accord with the applicable Federal law.

Hazardous wastes are not discharged at the Plant. The waste materials are reused, recycled, or shipped off site for disposal. A flow chart delineating hazardous waste management is given in Figure D-4, and a list of typical hazardous wastes managed annually is given in Tables D-1 and D-2.

Used oil, RCRA regulated metals, halogenated hydrocarbon solvents, and paint solvents are typically recycled, however, the fluid bed incinerator may be used when necessary.

Silver is reclaimed from spent photographic and radiographic fixing solutions. Solutions are transferred by drum from on-site film processing facilities to the two silver recovery units. The reclaimed silver sponge is melted and molded into silver "buttons" and is entered into the Rocky Flats precious metal inventory. The remaining waste is treated with other plant processes wastes.

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Photographic solutions are processed to recover silver and the stripped solution is processed and disposed of as hazardous waste.

Metal heat treating salt is currently being stored.

Two chemical laboratories on-site have the capability to detoxify small amounts of hazardous waste (bench scale) when needed. Hazardous materials that are treated in this manner include pyrophoric metals, small cylinders of toxic gases, and reactive chemicals. Disposal is on a one-time basis. Records for this treatment are maintained by the Hazardous Waste Coordinator.

Containers and labels for transporting hazardous waste are selected by reference to 49 CFR 172.101, Columns 4 and 5. All hazardous waste packages are marked with the information shown in Figure D-4. Policies regarding the on-site transportation of hazardous waste are provided in the On-site Transportation of Radioactive and Other Hazardous Materials Manual.

Requests for disposal of hazardous wastes are submitted via the Waste Processing Request form. These forms are kept on file. An operating log is maintained for all hazardous wastes. This log describes the generating process, waste material, hazard, volume, and disposition of each hazardous waste. A weekly inspection log is maintained (for 3 years) for the ignitable and halogenated solvents storage area as required by RCRA. Permanent records are kept of those analyses conducted to meet the requirements of RCRA.

Applications for environmental permits other than those specific to RCRA are maintained within the Health, Safety, and Environmental Department. The RCRA Interim Status (TSD Facility) application is kept in the Waste Operations Office.

The Waste Analysis Plan is maintained in the Waste Operations Office.

Job titles, job descriptions, and names of Waste Operations personnel are maintained by the managers of Liquid and Solid Waste Operations.

The RCRA requirements for emergency preparedness were reviewed by the Plant's Emergency Planning Office. The existing Emergency Control Plan, Rocky Flats PMS 16-002, meets the RCRA requirements.

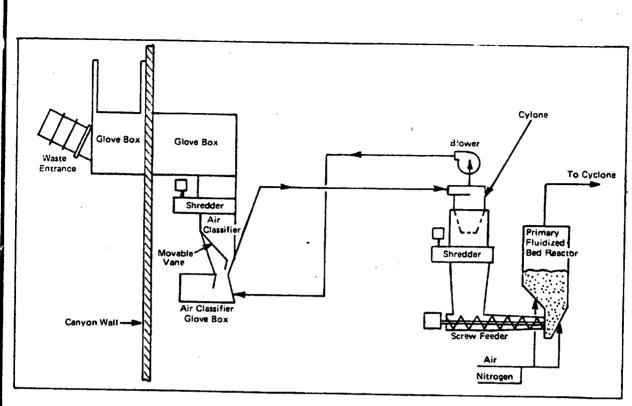
Environmental Analysis and Control also maintains a Spill Prevention Control Document which addresses RCRA requirements, spill prevention and control abatement, and Best Management Practices under NPDES.

Hazardous waste manifests are originated by the Traffic Department and copies are sent to Waste Operations to meet record-keeping requirements. These records are kept for 3 years.

An annual hazardous waste report is prepared. The report is based on the fiscal year, October 1 to September 30. A record of the report is kept for 3 years.

The Rocky Flats Plant uses certified RCRA transporters. Transporters are checked for reliability, and they must have an EPA ID number.

Agreements exist with various State and local authorities regarding response to any significant incident at the Plant. The Rocky Flats Emergency Plan and the Best Management Practices Plan detail notification procedures and actions to be taken by plant personnel.



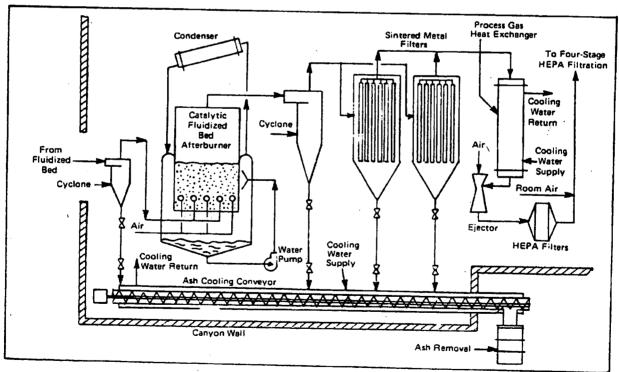


FIGURE D-5 FLOW DIAGRAM OF FLUIDIZED BED INCINERATION SYSTEM

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D-5 <u>Fluidized Bed Incinerator</u> (40 CFR 264.340, 264.344, and 264.345; CHWR 264.340, 264.344, and 264.345)

A Fluidized Bed Incinerator (FBI) was installed at the Rocky Flats Plant in 1978. Design philosophy and criteria were formulated to fulfill the needs and objectives of an improved rad waste incineration system. Unique process concepts include low temperature, flameless, fluidized bed combustion and catalytic after burning; in situ neutralization of acid gases; and dry off gas clean-up.

Operating temperature is 550°C, compared to 800-1200°C operating temperature of most incineration systems. High efficiency is achieved at this temperature by utilization of fluid bed agitation and heat transfer and catalytic after burning of hydrocarbons.

Acids produced during combustion are immediately neutralized by sodium carbonate bed media. In situ neutralization reduces equipment corrosion and eliminates the need for off gas scrubbing.

A dry off gas system is utilized in lieu of aqueous scrubbing solutions. This feature eliminates the need to process aqueous scrubbing solutions.

The incinerator can combust hazardous wastes that are highly ignitable and combustible. However, mixed solid waste has also been incinerated through test burns. The waste is pumped directly into the primary reactor for incineration (see Figure D-5). After start-up preheating, waste combustion maintains the operating temperature from the waste material without the need for an auxiliary fuel. Cyclone separation and sintered metal filtration are utilized to remove ash and particulate from the off gas before it passes through high efficiency filters and discharges into the building exhaust system.

D-5a Trial Burn

The conception of the FBI incinerator began in 1974 when laboratory scale incinerator burned 37,500 kgs of solid and 12,000 kgs of liquid. The pilot scale development work took place as early as 1972.

Numerous trial burns of hazardous materials were conducted beginning in 1978. In 1980, the EPA conditionally approved DOE application to destroy one gallon of PCB. The burn was conducted on May 19 with samples collected and split between EPA and Rockwell International laboratories. Based upon the results of the trial burn, EPA's analysis indicated that 99.9999 percent of the PCB were destroyed.

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Therefore, on Marh 25, 1982 DOE Rocky Flats was issued an Emission permit (C-13,022) for the FBI from the Colorado Department of Health -Air Pollution Control Division.

D-5b Incinerator Performance

Several process and equipment changes were made during the initial operational testing period. Some of the equipment performed as originally designed and some had to be replaced or modified.

Areas of excellent performance includes the liquid feeding system, primary reactor and tramp metal discharge system, cyclone separators, ash cooling conveyor, air ejector, and instrumentation and data aquisition system. Problems were encountered with the coarse waste shredder, air classifier, afterburner gas distributor, sintered metal filters, and high speed blowers. Equipment malfunctions were attributed to various factors, but the majority were associated with design scale-up uncertainties and the unsuitability of some commercially purchased items. Several modifications were necessary to achieve an operable and reliable system. The most extensive modifications were the redesign and replacement of the afterburner gas distributor, replacement of the high speed blowers with an air jet ejector and installation of additional sintered metal filters. With the revisions made through 1982, the unit became fully operational.

D-5c Engineering Drawings

The process concepts were presented earlier in this section. Additional detailed drawings and information are presented in Figure D-6, D-7, and D-8.

D-5d Sampling

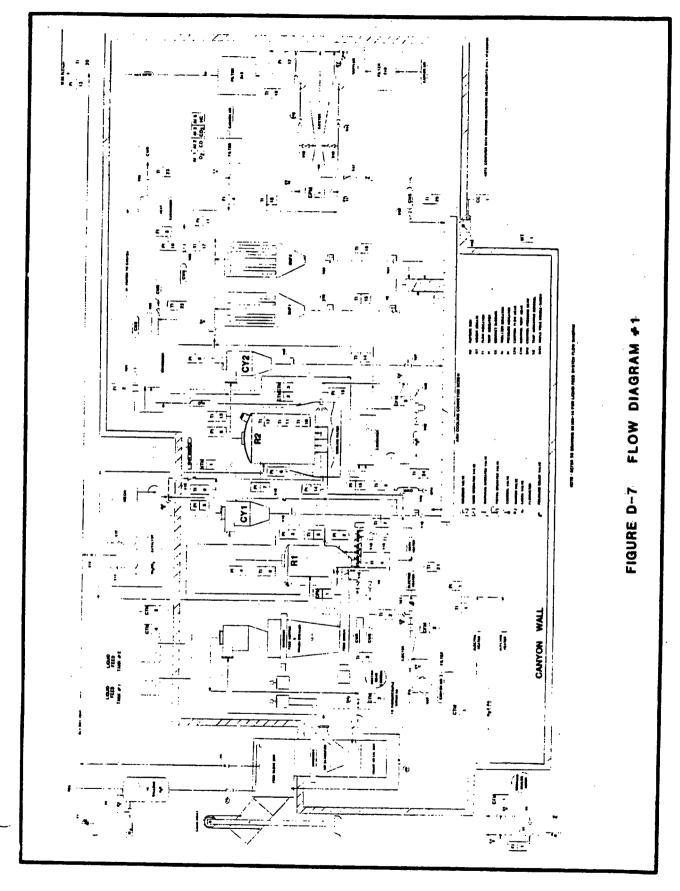
Off gas from the FBI is analyzed for oxygen carbon dioxide, carbon monoxide, and total hydrocarbon content. A Lear Siegler, Model CM 50 in-line oxygen analyzer monitors oxygen concentrations in the exhaust gas. The probe for this instrument is located in the exhaust duct immediately upstream from the gas cooler. The probe operates on a zirconium oxide fuel cell principle with probe voltage being proportional to the difference between oxygen concentration in the exhaust gas and the normal atmospheric concentration of oxygen. Readout is shown on a local meter and the CRT in the control room. Carbon dioxide, carbon monoxide, and hydrocarbons are all monitored by a Rockwell designed exhaust gas sampling system. The system samples, conditions, and distributes exhaust gas to a Beckman, Model 400, total hydrocarbon analyzer and an Infrared Industries, Inc., Model IR-702-041, dual carbon monoxide - carbon dioxide analyzer.

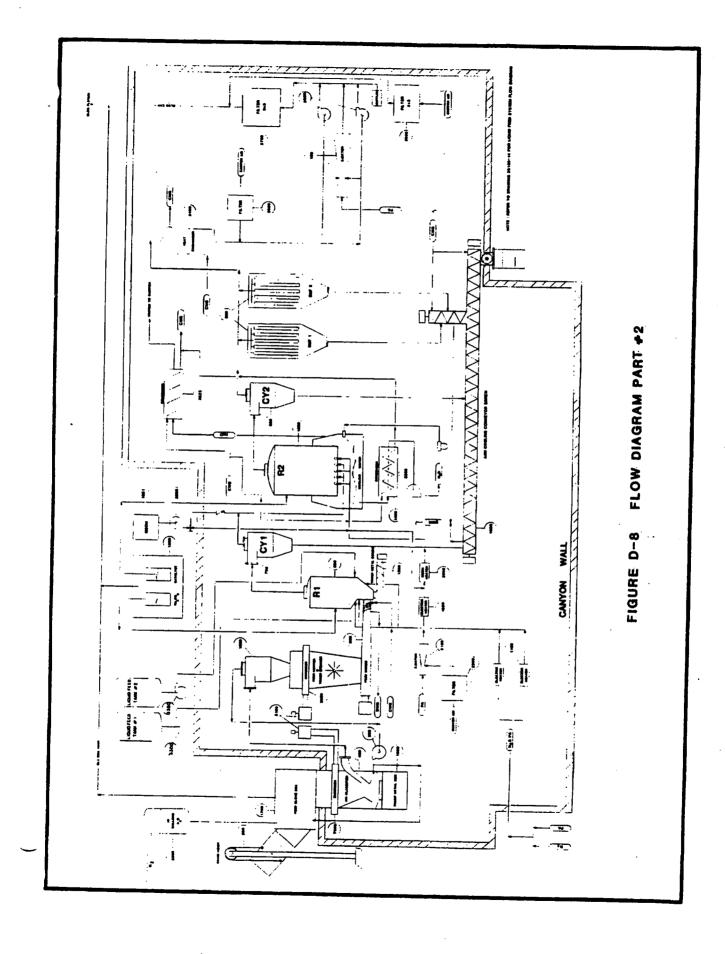
FIGURE D-6 EQUIPMENT AND FLOW LEGEND

BLOMING WOR

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I, WIND AWAE	. ZAD
O, WE VESTWIED BRIDGES AVEAS	CAS-CA11
1-115, POPENDED AVEAU	943
318, LINKS MYA AVEA	PA9
1-1/3, INJERIE AVEAU	CAS-CAS
NS, INTOLVENIE	IAD
3, GFORE AVEAU	184
a, MOTANY STAR WAS	PEA
S, OVIE AWAS	SIA-SEA
1, MESONIE HETEL AWAE	1 EA
P. OTJE AVEAS	OPA
3/8, CHECK AVEAE	\$1A-\$1A
3. HIRE DVIE AWAE	N13-N18
S, GWP AVEAE	ZIA" IIA
1. GLOBE WANT	EEA-BEA DI A-BA
1-11E, MICEONIE METEL AWAE	BA-LA
IO, BEDE AVENE	84
a, west awar	9.0
4, GRILLERAL'A AVEAG	IPA-BEA EIA' VA
SATA TIVE SATE	EA-EA
PATRA GETTE: APTAG	-:-
TOL SYMVE	MARTEN BATVA

(14 -404-04 & DANIEL & HOLLEAR GES/ GINDI T	2380
(PL-90100 # SAME) 1 FEELSAN GEZA GARGET	3300
MATERIA MOMES SAFALLE SAFA	2300
3400 13007804	3100
Chagadon Aal ah	9000
WINDS SERVE	3800
	1024
Afficial tologram	1900
DIEBUCH RAT AT	9018
tuaeo 19	2900
Kara	8065
AMMANAZ IA BA	00+1
WALNUT BELLDOS YANTED	1300
MIN	0088
myron a	9100
MUTA SH	0004
43143-	0001
ALCOHOL STORAGE TANK	1001
MENCAGO ARRORT (NY 150 DESARTE)	00001
OFFICENCES OF CASSON	9941
MANN METAL GLOW BOX	9991
MOSING COMMENS GLOVE BOX	0001
######################################	9001
ABM COLLING CONVEYER BUNEW	1300
MANNET TAL BOOKE	1800
CLETA.94	0011
CLAMMER CYCLOM	0004
CHARLON RSTAN JATHA CHISTING	000
SECOND ETACE CYCLOME	000
FREE STACE CYCLORE	004
PEACTOR ASSESSAT UTUD BED?	000
A TORUMEN ALBERT GYPS	000
VM CFVFFE,IEN	90+
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I PT AFEC	300
#0138.1	001
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	1074





A provision has been made for the future addition of a hydrogen chloride and a sulfur dioxide monitor. The hydrocarbon analyzer uses a flame ionization technique to identify exhaust gas hydrocarbon concentrations. The carbon monoxide - carbon dioxide analyzer is a dual monitoring, non-dispersive infrared type that measures both gas concentrations simultaneously. Concentration values are continuously displayed on local meters and on the CRT in the control room.

SECTION E

GROUNDWATER MONITORING

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E - GROUNDWATER MONITORING SYSTEMS

There are no regulated units as defined in CHWR 260.90 described in this application. The hazardous waste storage and treatment units are exempt from the groundwater monitoring requirements as stated in 40 CFR 264.90, 264.1, and 261.6 (a)(2).

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SECTION F

PROCEDURES TO PREVENT HAZARDS

SECTION F

PROCEDURES TO PREVENT HAZARDS

The information provided in this section is submitted in accordance with the requirements of 40 CFR 270.14(b)(4),(5),(7), (8), and (9) and CHWR 100.41(a)(4). These requirements address the following subject areas:

- o General security provisions.
- o Inspection schedule.
- o Spill prevention, control, and countermeasures and best management practices.
- O Prevention of accidental ignition or reaction of ignitable, reactive, or incompatible wastes.
- F-1 Security (40 CFR 270.14(b)(4))
- F-la Security Procedures and Equipment
- F-la(1) Twenty-four Hour Surveillance

Rockwell International, Rocky Flats Plant provides 24-hour site security by means of a Plant Security Force. Guards are stationed at the entrances to the Plant 24 hours per day to monitor vehicle and personnel traffic into the area. Gates are kept closed at all times and opened only for authorized traffic.

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One hazardous waste storage container and the gas storage shed are located within the plant security fence. They are locked when unattended.

Seven other hazardous waste storage containers are located outside the main security fence but within the boundary fence and are in the purview of the Plant's Security Personnel. The access road is posted "Limited Access" and the cargo containers are locked when unattended. A three strand cattle fence serves as a barrier to unauthorized persons and large animals.

F-la(2) Access to Site

Access to all container storage facilities is controlled. Keys to the containers are maintained by the Hazardous Waste Coordinator. The entire Rocky Flats Plant site is considered a high security area. The use of deadly force is authorized, and this fact is posted around the Plant site.

F-la(3) Warning Signs

Signs which are legible from a distance of 25 feet are posted in active portions of the storage area. These signs are visible from all approach angles and state "Danger -- Unauthorized Personnel Keep Out." Within the waste storage and handling areas "No Smoking - Hazardous Waste" signs, which are also legible for a distance of 25 feet, are placed at strategic locations. All signs

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are printed in English. A photograph of the posted sign is presented in Appendix F.1.

t-la(4) Communications

Rocky Flats maintains a communication/alarm network consisting of:

- o Public telephones.
- o Two-way radios.
- Alarm systems.

All personnel within the facility have access to one or more of the communication systems listed. Each permanent structure and all trailers have a minimum of one telephone.

Access to public telephones by all site personnel is direct or indirect. Plant Security personnel utilize two-way radios for communication.

F-2 Inspection Schedule

F-2a General Inspection Requirements

Rocky Flats conducts regular inspections of the storage areas for structural deterioration, uncontrolled runoff, spills, and other discharges that could cause or lead to the release of hazardous waste constituents. The purpose of the inspections is to detect any potential problems that may arise. Records of inspections and the inspection schedule are routinely kept on-site at the storage area.

F-2a(1) Types of Problems

Table F-1 gives the present schedule for inspecting monitoring equipment, safety emergency equipment, security devices, structural equipment, and the storage areas. This schedule and the listing of inspection locations may be periodically revised during the life of the permit to reflect operational and administrative requirements. The items listed are considered important because of their role in preventing, detecting, or responding to environmental or human health hazards. Provided with each item is a list of possible problems that are checked as part of the inspections.

F-2a(2) Frequency of Inspection

The frequency of inspections is based on the need and the effectiveness of an inspection to prevent the occurrence of an uncontrolled event. Inspections are typically performed at the intervals presented in Table F-1.

Inspections are performed by experienced and qualified Rocky Flats employees. If any malfunctions, deteriorations, or operating discrepancies are noted during the inspection, the inspector submits to his supervisor a description of the problem and the suggested procedure to eliminate the discrepancy. The appropriate organization is notified in the case of remedial action implementation.

Table F-1
Present Inspection Schedule

	Location	Minimum Frequency	Potential Problems			
1.	Gates/fence/warn- ing signs/radio/ telephone/light- ing	Weekly	Functional, damage, deteri- oration			
2.	Container storage areas	Weekly or after storm	Spills, structural integ- rity of containers			
3.	Personnel safety/ spill and emer- gency response equipment	Weekly or prior to and after use	Accessibility, inventory, malfunction, certified checkout, cleanliness, usage, availability			
4.	Miscellaneous	Weekly or after storm	Malfunction, blockage, in- tegrity, spillage			
5.	Hazardous Waste Treatment Areas	Weekly	Leaks, spills, fires, fumes			

F-2b Specific Inspection Requirements

F-2b(1) Gates/Fence/Warning Signs/Radio/Telephone/Lighting/
Inspection

All security measures taken at the site to prevent entry onto the site by unauthorized individuals are tested and verified on a regular basis. The security fence system is periodically checked for integrity. All access gates are monitored for ingress and egress. Any attempt to breach this barrier by human or animal intruders is noted and rectified.

Facility communications are checked for proper operation, and service records for the radio equipment are checked periodically. External communication checks are also performed.

F-2b(2) Hazardous Waste Area Inspection

Figure F-1 details the typical inspection form used to assess the various hazardous waste storage and treatment areas. The storage areas and storage containers are checked for aisle space and stacking violations, container labeling, the presence of spilled material, leaking drums, condition of locks, storage surface, and structure integrity. If hazardous conditions exist, remedial activity is instituted to control and clean up the spread of material. These inspections are designed to comply with 40 CFR 264.174 and CHWR 264.

DATE / /	TIME	INSPECTORS			
	•	STAT	vs		DATE AND NATURE OF REPAIRS 6
ITEM :	POTENTIAL PROFLEMS	ACCET- TALLE	TRIACCEP- TABLE	OBSER- VATIONS	REMEDIAL ACTIONS
1. <u>Arec</u>					
Adequate Signs	Removed				
Signs - legible	Not readable/ Damaged				
Construction	Access Blocked	•			
Structural and Surface Integrity	Cracks or Damage				
Housekeeping	Appearance Poor				

FIGURE F - 1

TYPICAL INSPECTION FORM

DATE/	TIMEINSPECTORS				
		STATUS PARTY OF SET	DATE AND NATURE OF REPAIRS &		
ITE::	POTENTIA FEGILE N	Valle Valle	TANDA TUACCES -	OF SET VACTOR	EPETIA. Villa
2. Inventory					
Containers- Stored	Deviated from stated inventory				NATURE OF REPAIRS & FENDIAL
	Labelling/marking				
Containers	Leakage				
	Deterioration				
	Compatability				
	Distortion			•	

FIGURE F - 1 (Cont.)

ATE/_	TIMEINSPECTORS					
	· · · · · · · · · · · · · · · · · · ·	<u> </u>				
		STAT	vs		DATE AND NATURE OF REPAIRS &	
HEM	FOTEVEIAL PROFILERS	ACCEP- DAFLE	TABLE	03 513- VAT1045	REMINIAL ACTION	
3. Storage			•			
Aisle Space	Blocked					
	Spillage					
Stacking ,	Exceeds height limit					
. Spill Supplies						
Absorption Pads	Missing .					
	Degraded					
Sand	Missing					
Drums	Missing			•		
	Fúll					

FIGURE F - 1 (Cont.)

ATE/	TIME	INSPECTORS			
	•	·			
		STAT	บร		DATE AND MATURE OF REPAIRS
TTEM	FOTENTIAL PROLLING	ACCET-	THACCEP- TABLE	AY21678 01 211 -	epoulai acrios
5. Containers					
	Rust				
	Damaged				
	Bulging				
	Improper Location				
6. Spill Collection					
	Material Present				
Liner	Full			•	
·	D. bris			•	
7. <u>Air</u>					
	Odor				
	Eisty				
	Poor Ventilation				

FIGURE F - 1 (Cont.)

F-2b(3) Safety Equipment Inspection

The Plant Fire Department maintains an inspection program. No fire equipment is kept in the waste storage and handling area. The Plant Fire Department will respond to any fire and any hazardous waste spills. Equipment is provided in other localized areas as required. Safety gear is available for immediate use to prevent adverse health effects and is with responding emergency equipment. First aid equipment is present where the potential for accidents is greatest. First aid supplies are checked for adequate stock.

F-2b(4) Miscellaneous Inspections

The Rocky Flats facility roads are inspected to ensure the safe movement of materials and the structural integrity of the roadways. The runon water diversion or collection facilities are inspected for integrity and operation. Runon/runoff control and drainage systems for the site, including specific units, are assessed as to their operational integrity.

F-3 Preventive Procedure, Structures, and Equipment

F-3 F-3a Cargo Container Storage

Under the direction of the Hazardous Waste Coordinator the transportation vehicle proceeds to the storage area. All containers are removed from the vehicle by hand or by utilizing designated mechanical equipment. Each container is visually reinspected at this stage to check for integrity and to make

certain that all regulatory and facility labelling is complete with respect to container identity. All containers that do not conform to these guidelines will be set aside for further processing and/or repackaging, if necessary, at the direction of the Hazardous Waste Coordinator. Those containers that cannot be properly or satisfactorily identified will be returned to the generators.

Upon acceptance at the storage facility the containers are placed inside the lined cargo containers for storage. Prior to initiating work in the storage area all personnel wear appropriate safety equipment as detailed by the Hazardous Waste Coordinator or his designated assistant. The area is inspected for proper ventilation and the presence and availability of emergency equipment.

F-3b Equipment Maintenance

Over the past years Rocky Flats has utilized a maintenance scheduling and recordkeeping system to ensure proper operation of hazardous waste equipment. This scheduling of routine procedures ensures that all equipment is in operational condition. These maintenance activities are conducted by the various equipment custodians.

At the completion or an activity requiring equipment usage, the dispatcher notes on the equipment record any equipment failures and notifies the maintenance personnel of the defect, which is

then scheduled for repair. This system of maintenance maximizes the level of equipment availability and operation. The preventive maintenance program is also used to project the need and the necessary availability of spare parts for the timely repair of key facility equipment.

F-3c Protective Personnel Equipment

Plant personnel are directed by Industrial Hygiene and Industrial Safety to wear the appropriate safety equipment for a specific working area. Each employee is responsible for obtaining and ensuring the proper fit of each piece of safety equipment. If an employee notices a defect, it is that employee's responsibility to replace the equipment and notify the appropriate personnel to facilitate timely repair. Each employee will also be responsible for safe operational activities. If it is determined that a particular task does not comply with safe operating practices, the employee is responsible for notifying each individual up the chain of command as to the nature and the corrective action necessary for the safe completion of the task in question. To facilitate this process all employees are trained in the safe operating practices to be used in handling hazardous materials.

Rocky Flats retains onsite a large inventory of safety and respiratory equipment for use in handling the wastes that are enumerated in Sections A, C and D of this application.

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F-3d Storage Container Area

The physical structure, equipment, and operating practices of the storage container area are designed in a manner that will contain releases of material, create a safe working environment, and provide the expedient and proper remedial activity for possible problematic events. The cargo containers are lined with a steel pan capable of holding the entire contents of the drums in the container. The storage containers are designed for adequate ventilation to prevent the accumulation of vapors that could cause explosive or unsafe working conditions.

Equipment and operating practices in the storage container area are such that when processing ignitable materials, open flames are removed from the working area and other possible ignition or spark sources are minimized. Spill control equipment is located at this facility.

F-3e Runoff Control

Site drainage and runoff control are designed to meet a 10-year, 24-hour storm. The determination of these quantities is based on the logic method of calculation and are "worst case" determinations. Figure B-5 details the overall site runoff drainage pattern system.

F-3f Runon Control

The design of site operations is to minimize the exposure of waste storage and handling portions of the facility to runon

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waters. The waste drums are stored in sealed cargo containers lined with a 6-inch deep pan. Because of the site topography and grading it is unlikely that runon water would be of sufficient quantity to enter the container storage units.

F-3g Water Supplies

To prevent the contamination of domestic drinking supplies, the runoff and run-on control systems, as well as the waste handling operations, have been optimized. Any hazardous waste storage site improvements will include sloping and grading to prevent uncontaminated offsite runon from entering the site, as well as contaminated onsite surface liquids from leaving the site as contaminated runoff. All drainage is covered via surface sloping handled through sedimentation basins operated in series.

No water supply wells are located within 1,000 feet of the cargo containers.

F-4 Procedures for Handling Ignitable, Reactive, Corrosive, Toxic, and Incompatible Wastes

F-4a General Hazards

F-4a(1) Ignitable Wastes

The processing, storage, and disposal of ignitable wastes pose various handling problems. The following are areas of concern when processing such wastes:

. . . .

<u>Ignition</u>: Many wastes are ignitable and pose a serious fire hazard. All operations, equipment, and nearby combustion sources must be managed so that the possibility of ignition is minimized.

Explosion Hazard: Some ignitable materials generate enough vapors or upon ignition generate vapors rapidly enough to cause an overpressure and pose a possibility of rapid combustion. Wastes that display this potential will be modified or treated in a manner that renders them noncombustible prior to disposal.

Toxic Inhalation Potential: Many of the materials that are ignitable generate large quantities of vapors. These vapors may pose an inhalation threat to individuals involved in processing the waste. Proper respiratory equipment will be used by all personnel involved in handling these materials.

Toxic Skin Absorption: Some compounds that display ignitability can also be absorbed by the skin. As an example, kerosene has this property and has an OSHA set exposure limit. Each ignitable material must be assessed for skin exposure limits and the appropriate safety equipment must be worn.

Toxic Ingestion: Some organic compounds that are ignitable will, upon ingestion, ary and crack the epithelial lining of the gastrointestinal tract or dissolve the tissue. These situations lead to bleeding and further spreading of toxic materials to the bloodstream, causing further damage.

These hazards are to be considered prior to processing waste materials that exhibit such properties.

Some of the ignitable materials may also have a solvent property that affects the storage, transfer, and treatment vessels, thereby increasing the possibility of structural attack.

F-4b Handling Procedures to Prevent Hazards

F-4b(1) Ignitable Wastes

Prior to handling the material, all personnel will be directed by the Hazardous Waste Coordinator, Industrial Hygienist, or their assistants to wear the appropriate safety and respiratory equipment. Personnel will then survey the work area for any sources of ignition or open flame. These sources will be removed from the work area. If handling equipment is to be used, only equipment that is compatible with the material will be used, such as diesel-powered machinery. Transportation vehicles will be secured with chocks to prevent movement. Where there is a high potential for spills, work will be performed within diked areas. Each work station will be equipped with the appropriate first aid and fire fighting equipment to handle minor incidents. Personnel will also be in contact with and notify emergency response personnel and the area dispatcher by two-way radio in the event of an uncontrolled event.

F-4b(2) Reactive Wastes

Prior to handling the material, all personnel will be directed by

the Hazardous Waste Coordinator, Industrial Hygienist, or their assistants to wear the appropriate safety and respiratory equipment. Personnel will next survey the work area for any potential problems or situations that could lead to an uncontrolled event (such as acids in close contact with sulfide materials). If the material is reactive with the addition of heat, sources of heat above the specified level for the material must be removed. Those reactive materials that are subject to rapid combustion will be handled appropriately to minimize the effects of such an event. The methods for handling each waste material or class of material will be specified prior to handling. In work areas dealing with reactive materials the appropriate first aid, fire protection, and remedial action equipment will be present at the work site prior to initiation of work.

F-4b(3) Incompatible Wastes

No incompatible wastes will be stored or solidified with other incompatible wastes at the Rocky Flats site. The Hazardous Waste Coordinator determines compatibility prior to storage of the material at the Rocky Flats facility. Suspect individual waste shipments will be sampled and tested for compatibility prior to contact with other wastes or equipment. Incompatible wastes will be segregated from wastes that would cause a reaction, vapors, fire, or explosion.

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F-4b(4) Corrosive Wastes

Prior to handling the material, all personnel will be directed by the Hazardous Waste Coordinator, Industrial Hygienist, or their assistants to wear the appropriate safety and respiratory equipment. If the material is incompatible with any other material handled at this site, these materials will be segregated. The methods for handling this material will be specified prior to handling. In work areas dealing with corrosive materials the appropriate first aid, safety, and remedial action equipment will be present at the work site prior to initiation of work.

F-4b(5) Toxic Wastes

Prior to handling the material all personnel will be directed by the Hazardous Waste Coordinator, Industrial Hygienist, or their assistants, to wear the appropriate safety and respiratory equipment. The methods for handling of these materials will be specified prior to handling. In work areas dealing with toxic materials the appropriate first aid, safety, and remedial action equipment will be present at the work site prior to initiation of work.

F-4c Management Practices

F-4c(1) Ignitable Wastes

Rocky Flats uses a number of quality assurance and document tracking systems to facilitate the management of containerized ignitable wastes.

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After acceptance the wastes that are to be stored are taken to the storage facility. The containers are entered on an Operations Report. The storage record tracks the location of each container or group of containers from the date of acceptance for disposal to final disposition. All containers are stored segregated from other waste types with appropriate aisle space in each storage container and in a manner that permits inspection of surfaces for possible loss of containment.

Containers that are disposed of are recorded on the Operations Report. These procedures are used to ensure the proper handling, storage, and disposal of containerized wastes while creating and supporting a safe working environment.

F-4c(2) Containerized Reactive Wastes

Rocky Flats utilizes a number of quality assurance and document tracking systems to facilitate the management of containerized reactive wastes. After acceptance the material will be properly stored. The containers that are to be stored will be processed in a fashion similar to the ignitable wastes as set forth in subsection F-4c(1). Care will be taken to ensure that the specific reactive material is not placed close to other materials that may create an uncontrollable event.

F-4c(3) Containerized Corrosive Wastes

Rocky Flats utilizes a number of document tracking systems to facilitate the management of containerized corrosive wastes.

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Containers are checked and inspected.

After acceptance the material will be properly stored. The ontainers to be stored will be processed in a fashion similar to the ignitable wastes as set forth in subsection F-4c(1). All containers will be stored segregated from other waste types with appropriate aisle space and in a manner that permits inspection of surfaces for possible loss of containment.

Containers that are disposed of are recorded on the Operations Report. These procedures are used to ensure the proper treatment, storage, and disposal of containerized wastes while creating and supporting a safe working environment.

F-4c(4) Containerized Toxic Wastes

Rocky Flats utilizes a number of document tracking systems to facilitate the management of containerized toxic wastes.

Containers are checked and inspected.

After acceptance the material will be properly stored. The containers to be stored will be processed in a fashion similar to the ignitable wastes as set forth in subsection F-4c(1). All containers will be stored segregated from other waste types with appropriate aisle space and in a manner that permits inspection of surfaces for possible loss of containment.

Containers that are disposed of are recorded on the Operations Report. These procedures are used to ensure the proper

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treatment, storage, and disposal of containerized wastes while creating and supporting a safe working environment.

SECTION G

CONTINGENCY PLAN

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SECTION G

CONTINGENCY PLAN

G-1 Introduction

This Contingency Plan has been developed to meet the requirements of CHWR 100.41a(7) and 264, Subpart D.

G-la Background

The Rocky Flats Plant covers almost 11 square miles, occupying Sections 1 through 4 and 9 through 15 of R 70W, T 2S of Jefferson County, Colorado. It is located 16 miles northwest of Denver and 9 to 12 miles from the communities of Boulder, Golden, and Arvada. Access to the site is from Colorado highway 93 on the west side, or Indiana Street on the east.

G-lb Scope and Objectives

All generators of hazardous wastes are responsible for developing a Contingency Plan. The Plan specifies actions to effectively minimize and abate hazards to human health and the environment from fire, explosion, emission, or discharge of hazardous waste constituents to air, soil, surface water, or groundwater.

The Rocky Flats facility provides storage and treatment of hazardous wastes generated on-site. The contingency plan addresses the management of these hazardous waste units. The Contingency Plan updates the Best Management Practice and Emergency Response Plan prepared for the Rocky Flats facility

in 1983. The Plan will be further updated as processes and facilities change in the future. The Contingency lan has been prepared in accordance with RCRA 40 CFR 264, Subpart D, requirements and the comparable Colorado Department of Health regulations and policies.

G-2 Facility Description

G-2a Site Layout

Figures B-1 through B-8 show the major features at the Rocky Flats site. These features include all existing buildings and roadways, surface waters and flood plains, drainage patterns, surrounding land use, etc. No public or private water supply is located at the site.

G-2b Site Drainage

Figure B-5 depicts the surface water drainage patterns for the Rocky Flats facility. Storm drains on-site and all other drainage is handled through surface sloping to a series of swales and drainageways. Generally, surface water drainage is to the east and is handled through a series of sedimentation ponds until storm water discharges to a natural drainage ditch.

G-3 Facility Operations

G-3a Nature of Facility Operations

As previously noted, Rocky Flats operates a hazardous waste storage facility. Hazardous wastes are stored in cargo containers

with a stainless steel pan liner until the waste can be shipped off-site for disposal or treated.

G-3b Waste Management

As described in the Sections A,C and D, the hazardous wastes handled by this facility are from on-site sources. Rocky Flats stores the following categories of waste:

- o <u>Ignitable</u> (I) -- Waste solvents.
- O <u>Corrosive</u> (C) -- Acids and bases.
- o Reactive (R) -- Reactive gases, acids and miscellaneous laboratory wastes.
- O Toxic (T) -- Specific listed hazardous wastes.
- o <u>Acutely Hazardous</u> (H) -- Cyanide and other EPA listed "P" wastes.
- O EP Toxic (E) -- Wastes contaminated with heavy metals that can leach under simulated landfill conditions.

Depending on the waste characterization, the wastes are stored temporarily and/or treated prior to off-site transport and disposal or reuse. Typically, drummed wastes are delivered to the modified cargo container storage facility by truck and are off-loaded by hand prior to placement in storage. Runoff is being collected from the storage area in the series of holding ponds on the plant site (Section B). Spills that occur during transfer between the storage and waste generating areas will be contained with absorbent material and packaged for off-site disposal. Spills at the waste treatment areas, which are inside buildings, are contained and cleaned up for disposal.

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Drummed wastes staged in the drum storage area are approximately segregated as follows:

- o Ignitable/solvents.
- Other.

The containers are properly packaged, marked, and labelled when they are placed in storage.

Stacking of drums is not permitted. Aisle space is maintained to provide access and an isolation zone between waste types. Each waste type is provided a separate storage area. The storage containers are equipped with steel catch/drip pans that are designed to contain the entire volume of all drummed waste that is stored in them. Spill cleanup materials stored at the storage area include absorbent material, shovels, brooms, and empty recovery drums.

G-4 Pollution Incident Prevention Practices

G-4a Inspection and Monitoring

G-4a(1) Hazardous Wastes

Rocky Flats conducts weekly inspections of the waste storage area. The Hazardous Waste Coordinator is responsible for having this weekly inspection performed and for completing the inspection report. This written report is recorded on inspection log sheets (see Figure G-1).

	INSPECTORS						
							
	·	STAT	บร		DATE AND NATURE OF REFAIRS &		
115	POTENTIAL TRANSPORT	ACCT1 - 2/317	Unacetpa Andli	**************************************	KETETIAL VILLUT		
1. Arec	•						
Adequate Signs	Removed		•				
Signs - legible	Not readable/ Damaged						
Construction	Access Blocked						
Structural and Surface Integrity	Cracks or Damage			•			
Houselecping	Appearance Poor			•			

FIGURE G - 1

TYPICAL INSPECTION FORM

1KSPLCTORS DATE AND RATURE OF REFAIRS & STATIS EFM 124. 241..) 17.70053+ /:(F*-(1) \$1 } W** 1 * . 171:: FITFSTLAY FE ILES 2. Inventory Deviated from stated inventory Containers-Stored Labelling/marking Containers Leakage Deterioration Compatability Distortion

TIME

DATE

FIGURE G - 1 (Cont.)

TIMI INSPLCTORS DATE AND NATURE OF REPAIRS & STATUS RYMII IAL ACCES-LATES THACCES -C1511-W.73694 331.4 White the less 11:15 3. Storage Aisle Space Blocked Spillage Stacking Exceeds height limit 4. Spill Supplies Absorption Pads Missing Degraded Sand Mirsing Drums Missing Full

FIGURE G - 1 (Cont.)

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, .		TATE	vs	·	DATE AND KATURE OF REPAIRS &
1711	FOTENTIAL FFORLIST	ACCES - TALLAS	THACCES - TAPLE	01 ff1 - VAT 1656	ereniai Atenda
5. Containers					
	Rust				
	Damaged				
	Bulging				
•	Improper Location			•	•
6. Spill Collection					
	Material Present				
Liner	Full				
	Debris				
7. <u>A1r</u>					
	Odor				
	Elety			•	
	Four Ventilation	•			

FIGURE G - 1 (Cont.)

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Typical problems that may be encountered with each inspection item are provided on log sheets to serve as a reminder to the inspector and to ensure a complete inspection. The inspector is required to check the status of each item and indicate whether its condition is acceptable or unacceptable. Observations are made as to the number of containers, condition of the containers, aisle space, proper segregation, etc.

If the status of a particular item is unacceptable, appropriate and complete information will be recorded including the date and nature of the required remedial action or repair.

Inspection logs are maintained for each calendar year. After an inspection is completed, each log sheet is filed. As required, records of inspections are kept for at least 3 years following the date of the inspection.

G-4b Housekeeping and Maintenance

G-4b(1) Hazardous Materials

Specific area operational personnel are responsible for keeping their areas neat and in order. Chemical spills are cleaned up by plant personnel to prevent discharge or transport to other areas. Spilled materials are identified and noted by the plant personnel doing the cleanup.

G-4b(2) Hazardous Wastes

If inspections reveal that a hazard is imminent or has already occurred, remedial action will be taken immediately. Rocky Flats inspection personnel will notify the Hazardous Waste coordinator and any other appropriate people internally and initiate remedial actions. In the event of an emergency involving the release of hazardous constituents to the environment, efforts will be directed toward containing the hazard, removing it, and subsequently decontaminating the affected area.

If nonemergency maintenance is needed, it will be completed as soon as possible to preclude damage and the need to implement the Contingency Plan.

G-4c Material Compatibility

Hazardous wastes are stored in proper containers (See Section D for container descriptions).

G-4c(2) Hazardous Wastes

The initial responsibility for ensuring waste/container compatibility is addressed by the generator who packages the waste material for storage in the storage area. The Hazardous Waste Coordinator will notify a generator if improper container packaging practice need to be corrected. They will notify the generator to initiate corrective action. For those waste materials arriving at the storage area in improper containers, the Hazardous Waste Coordinator will either repackage the

material into compatible or proper containers, or return the material to the generator.

Ignitable liquids, solvents, organics, and other waste chemicals or other regulated materials (liquids) are containerized in carbon steel drums that meet U.S. Department of Transportation Specifications.

G-4d Security

Security at the Rocky Flats hazardous waste facilities is discussed in Section F earlier in this document.

G-5 Emergency Response and Notification

G-5a Emergency Coordinator

The Emergency Coordinator (EC) (the Shift Superintendent) is notified of incidents that involve hazardous materials or wastes. The EC is contacted by calling the Plant emergency telephone number, Extension 2911. This number will simultaneously alert the Plant Protection Central Station, Fire department, and Medical Department.

The Emergency Coordinators are thoroughly familiar with all aspects of the Contingency Plan, all site operations and activities. In addition, these individuals have the authority to commit the resources necessary to carry out the Plan. Table G-2 lists other services that may be contacted for emergency response and those organizations that could possibly be contacted by the

Emergency Coordinator in the event of an emergency that requires implementation of the Plan.

G-5b Implementation of the Plan

The decision to implement the Plan depends on whether or not an imminent or actual incident threatens human health or the environment. The purpose of this subsection is to provide guidance to the Emergency Coordinator in making this decision by providing decision-making criteria.

The Plan could be implemented in the following situations:

- o Fire and/or explosion in the following cases:
 - A fire could cause the release of toxic fumes.
 - The fire spreads and could possibly ignite materials at other locations on-site or could cause heat-induced reactions.
 - Use of water or water and a chemical fire suppressant could result in contaminated runoff.
 - An explosion has occurred or has a potential to occur.
 - An imminent danger exists that an explosion could ignite other hazardous wastes at the facility.
 - An imminent danger exists that an explosion could result in the release of toxic materials.
 - Spills or material release.
 - The spill is reportable per criteria specified under CERCLA.

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Table G-2

Emergency Contacts

MEDICAL ATTENTION NEEDED

Hospital

St. Anthony North 2551 West 84th Avenue Westminster, CO

University of Colorado Health Sciences Center

4200 East 9th Avenue Denver, CO

<u>Ambulance</u>

On-Site Ambulance Service with exception of helicopter ambulance from St. Anthony

303-966-2911 (on-site x-2911)

303-426-2151

303-399-1211

FIRE/EXPLOSION

Fire Department

On-Site Service

303-966-2911 on site x-2911

EXTERNAL EMERGENCY RESPONSE

<u>Police</u>

Jefferson County Sheriffs Department 1600 Arapahoe

303-277-0211

Golden, ČO

Colorado State Patrol

303-757-9475

TABLE G-2 (Continued)

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3	E	1	ш	ı	•

Other Agencies

Lo	C	a	1
_	_		

Jefferson	County Health	Department	303-252-6301
260 South Lakewood,			

Broomfield Water Utility District	303-469-3301
225 Commerece	
Broomfield, CO	

Westminster Water Department	303-429-1546
3031 West 76th Avenue	
Westminster, CO	

<u>State</u>

Colorado Department of Health Hazardous Waste Control Division 4210 East 11th Avenue	303-320-8333
Denver, CO	

Water Quality Control Division	303-320-8333
Department of Disaster Emergency Services Camp George West Golden, CO	303-279-2511

Colorado Division of Wildlife	303-825-1192 x 253
6060 Broadway	(after hours
Denver, CO	303-355-7287 or 303-421-0357)

Federal

U.S. Environmental Protection Agency, Region VII	303-844-2407
EPA/National Response Center Washington, DC (24 hour service)	800-424-8802

G-5c Emergency Procedures and Team

G-5c(l) Notification

Figure G-2 depicts the sequence in which the Emergency Coordinator and the appropriate local, state, and Federal agencies are to be contacted. The employee discovering a spill or leak is responsible for notifying the Emergency Coordinator. It is then the Emergency Coordinator's responsibility to determine the seriousness of the incident and, if he deems it necessary, to follow the action sequence shown on Figure G-2, and make the necessary internal and external contacts. The procedures to be followed for various potential emergencies are given in the subsections that follow.

G-5c(2) Identification of Hazardous Materials or Wastes
The initial response of the Emergency Coordinator will be to obtain the following information:

- o The character, exact source, amount, and areal extent of the release.
- Whether the release could move off-site.
- o Whether spill procedures have been implemented.
- Whether the release has been stopped and the process has been shut down.
- O Whether there are any injuries.

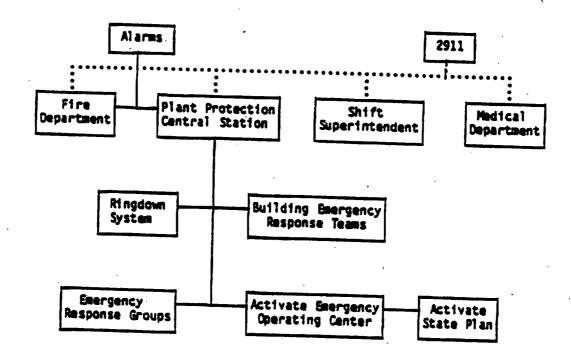


FIGURE G-2 EMERGENCY RESPONSE FLOW CHART

The initial identification method will be to utilize visual inspection of the material and the location of the release. Material stored at Rocky Flats is generally labelled as to contents; therefore, a visual inspection should be sufficient to identify the waste. If the released material cannot be identified, limited sampling, under appropriate safety protocols, and fingerprint analysis will be used.

G-5c(3) Assessment

The Emergency Coordinator will assess possible hazards, both direct and indirect, to human health or the environment. This assessment will be based on the following:

- o The character of the released material.
- O The exact source of the released material.
- o The process or storage facility from which the released material is emanating.
- o The amount of the released material.
- O A determination of the areal extent of the released material.
- O An assessment of the possible hazards to human health and the environment.

The information used in making assessments may include the following:

- Emergency Coordinator observations.
- Reports from Rocky Flats operational and technical support employees.
- Waste characterization data.

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o Other pertinent sources of information.

Once the area of involvement is identified, the Emergency Coordinator will acquire the appropriate facility records of the waste stored, including on-file waste analyses, manifests, and other pertinent data.

Based on this assessment, the Emergency Coordinator will evaluate possible hazards to human health or the environment that may result from the release, fire, or explosion. This evaluation will consider both direct and indirect effects of the release, fire, or explosion (e.g., the effects of any toxic, irritating, or asphyxiating gases that are generated, or the effects of any hazardous surface-water runoff from water or chemical agents used to control fire- and heat-induced explosions). This assessment will include surrounding areas, both on-site and off-site.

Should on-site or off-site evacuation be indicated, the Emergency Coordinator will notify the appropriate personnel, including fire, police, or disaster control personnel, or the on-scene coordinator, should such be provided by the regulatory agencies. (Evacuation and notification procedures are addressed in Subsection G-5d(1) and Section G-6, respectively.)

G-5c(4) Control Procedures

Potential incidents fall under the following three general classifications:

- o Fire and/or explosions.
- o Spills or material release.
- o Power or equipment failure.

G-5c(4)(a) Fire and/or Explosion

If there is a fire or explosion in an area where hazardous materials or wastes are stored, regular emergency procedures shall be used. The Emergency Coordinator will be notified and will be responsible for advising emergency personnel as to special hazards relating to the hazardous materials or wastes. The response group to a fire will be the Rocky Flats Fire Department or the local building fire brigade.

If the fire has the potential of reaching any stored hazardous materials or wastes, they will be moved, if possible, to a secure area (especially ignitable wastes). If the hazardous wastes are not accessible because of spreading fire, they should be sprayed with the appropriate supressant. If the chances of an impending explosion are high; i.e., fire envelopes ignitable wastes, the entire area should be evacuated.

Fires occurring in the drum storage area may have to be fought with foam. Fire-fighting personnel are instructed in the use of self-contained breathing apparatus (SCBA). Supervisors in unaffected areas will stay with their personnel and remain at work until instructed to evacuate to the designated assembly areas and account for the persons under their supervision.

An "all clear" signal will be given when the fire has been

extinguished and the safety of personnel is no longer endangered. The Emergency Coordinator will determine when the emergency has passed and the "all clear" signal can be given. All equipment used in the emergency must be cleaned and fit for use prior to resumption of plant operation in the affected areas.

If an employee discovers a chemical spill or process upset resulting in a vapor release, that employee will immediately implement emergency procedures. That employee will immediately contact the Emergency Coordinator as described in Subsection G-5a. When contacted, the designated Emergency Coordinator will obtain information pertaining to the following:

- Material spilled or released.
- o Location of the release or spillage of hazardous material and the process involved.
- o An estimate of the quantity released and the rate at which it is being released.
- o Direction in which the spill, vapor, or smoke release is heading, and the potential for moving off-site.
- o Any injuries involved.
- o Fire and/or explosion or possibility of these events.

This information will help the Emergency Coordinator assess the magnitude and potential seriousness of the spill or release. If the accident is determined to lie within the company's emergency response capabilities, the Emergency Coordinator will contact and deploy the necessary in-plant personnel to stop, contain, control, and/or clean up the spill.

If a spill has the potential for moving off-site the Emergency Coordinator will direct personnel to the appropriate surface discharge point and take all necessary steps to contain the spill on the Rocky Flats site. Based on the existing topography, all surface drainage would discharge to detention basins where cleanup actions would be concentrated. The impact of the release will be assessed by means of limited sampling and fingerprint analysis. If the spill incident requires cleanup measures, the EC will utilize on-site equipment or contact a commercial spill cleanup contractor and direct them in the implementation of the required procedures.

Any spill that is a reportable quantity under CERCLA is reported, and appropriate authorities will be contacted when the spill has been contained or controlled.

The initial response to any emergency will be to protect human health and safety, and then the environment. Identification, containment, treatment, and disposal assessment will be the secondary responses.

G-5c(4)(c) Power or Equipment Failure

A power interruption would not affect hazardous waste management facilities at the Rocky Flats Plant because the plant has emergency electrical power generation capabilities.

G-5c(4)(d) Spills and Leakage

Hazardous Waste management areas are routinely inspected for

signs of leaks, spills, deterioration, or damage. If there are indications of unit failure or containment system failure that threaten human health or the environment, the plan will be implemented immediately. The plan clearly outlines the steps necessary to evaluate the extent of damage and the measures necessary to correct the problem.

Upon observing or detecting a spill, facility employees will implement the following procedures:

- As soon as practical, contact their supervisor and describe the location, quantity (approximate), extent, and composition of the spill.
- o The supervisor will determine whether an emergency condition exists and the Emergency Coordinator will be contacted according to operating protocol.
- o If action by the Emergency Coordinator is not required, the supervisor will typically implement the following steps:
 - Specify the extent and nature of the spill and contact the Hazardous Waste Coordinator for dispatch of appropriate cleanup equipment.
 - Dispatch an employee to the spill site to prepare a report that defines the problem and details the follow-up activities that are necessary.
- O The supervisor will contact the Emergency Coordinator if there has been a fire, explosion, or injury and/or a

spill. At this point, the Emergency Coordinator will assume control and implement the following procedures:

- Determine the nature and extent of the spill.
- Order evacuation of the affected area if the incident involved uncontrolled releases of ignitables, corrosives, or reactives.
- Dispatch a response team to the location of the spill or leak, only if they are able to safely mitigate an incident.
- Contact the Hazardous Waste Coordinator.
- Call the National Response Center if the spill is a reportable quantity.
- Once cleanup operations are in progress, prepare and complete a report that defines the problem and details the follow-up activities that are necessary.
- Subsequently, determine the cause of the spill and institute correction of the problem. Corrective actions will then be taken.
- Spilled hazardous waste from small containers will be expeditiously collected, removed, and either placed in replacement containers or recovery drums and disposed of properly.
- If appropriate, soil in the spill area will be analyzed for the constituents spilled. Soil will be removed until subsequent analysis indicates that the area is decontaminated.

To prevent the recurrence or spread of fires, explosions, or releases that are reported to the Emergency Coordinator and require implementation of the Contingency Plan, the Emergency Coordinator will:

- o Investigate the cause of the occurrence or incident.
- o Identify alternatives to prevent a recurrence.
- Coordinate implementation of measures to reduce the risk of a recurrence.

Records of these actions will be maintained in the facility operating record.

G-5c(6) Storage and Treatment of Released Hazardous Wastes
Once cleanup procedures are completed, the Emergency Coordinator
Will make arrangements with the Hazardous Waste Coordinator for
the treatment, storage, or disposal of the resultant hazardous
Wastes.

Incompatible materials, if present at the site, are segregated. Should alternate storage of materials be required, or storage of cleanup material, the Hazardous Waste Coordinator and/or the Emergency Coordinator will direct operating personnel to maintain physical segregation and proper marking of such stored material. Should an incident involve a process area, processing will not be resumed until complete cleanup/decontamination is accomplished.

G-5c(7) Post-Emergency Equipment Maintenance

After an emergency event, all emergency equipment used will be cleaned so that it is fit for reuse, or it will be replaced. Complete cleanup may also require removal of contaminated soils. Personnel decontamination will include showers and cleaning clothing and equipment. All contaminated materials, including sorbents, cloth, soil, wood, etc. that cannot be de-contaminated, must be disposed of at a permitted hazardous waste disposal facility designated by the Emergency Coordinator.

Hazardous materials must be carefully packaged in leakproof containers in accordance with DOT regulations before being transported. Before operations are resumed an inspection of all safety equipment will be conducted.

Notification that post-emergency equipment maintenance has been performed and operations will be resumed will be provided to appropriate authorities, as necessary.

G-5d Emergency Equipment

The Rocky Flats Fire Department is adequately equipped to handle an emergency at Rocky Flats. Fire extinguishers are placed on all trucks, and fire hydrants are located throughout the Plant site. Additional fire fighting equipment (foam) is available from local Fire Departments near the Plant.

In addition to fire fighting equipment, other safety equipment is presently available on-site to handle emergency situations. A

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list of this equipment is shown in Table G-3. Protective clothing and equipment is located in the Hazardous Waste Coordinator's Office.

In addition to fire fighting and safety clothing/equipment, the Rocky Flats facility has materials and equipment on hand for spill containment and cleanup. Table G-4 presents a list of items that are being maintained on-site.

G-5d(1) Evacuation Plan

All emergencies require prompt and deliberate action. In the event of a major emergency that could threaten human health or the environment as described herein, it will be necessary to follow an established set of procedures. These procedures will be followed as closely as possible; however, in specific emergency situations, the Emergency Coordinator may deviate from the Plan procedures to provide more effective actions for bringing the situation under control. The Emergency Coordinator is responsible for determining which emergency situations require plant evacuation.

The general evacuation signal is a verbal command given over the facility communications system to initiate evacuation of the plant areas. In addition to the alarm, two-way radios and the internal telephone system are used to notify facility personnel of the nature of an emergency and the recommended plan of action. In the event of a power failure, the Emergency Coordinator

Table G-3

Existing Fire Fighting Equipment and Locations

- Two pumper trucksOne water tanker truck
- O One fully equipped ambulance
- o One fully equipped rescue vehicle
- One "brush" truck, used primarily for grass fires
- o Two general-purpose vehicles
- O Scott air packs
- O Assortment of organic vapor and acid gas respirators
- o Tyvek suits
- o Gloves
- o Boots

 $\label{eq:Table G-4}$ Materials and Equipment for Spill Containment and Cleanup

Material(s)/Equipment	Substances Contained, Absorbed/Cleaned Up
Standard industrial absorbents (Sorb-All, vermiculite, etc.).	For small spills of oil, solvents, and organic materials. Not used for acids or caustics unless first neutralized.
55-gallon and 85-gallon recovery drums; steel, poly-lined steel	Most organics (steel); acids, caustics, contaminated absorbent materials (poly-lined/steel).
Portland Cement	Cement is unreactive with most chemicals (except concentrated acids).
Backhoe	For removal of contam- inated soil/slags, sed- iment, etc.

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communicates evacuation instructions to area supervisors by telephone. All employees are familiar with the evacuation command and operation of the radios and internal telephone systems.

In the event evacuation of the facility is called for by the Emergency Coordinator, all employees, contractors, and visitors will immediately leave their work areas and proceed to the designated assembly areas. Rocky Flats personnel will be accounted for by their immediate supervisors. A list of visiting personnel will be prepared from the site sign-in records. Personnel evacuation will proceed as follows:

- o If downwind of the incident, evacuate perpendicularly to the wind direction over the most accessible route.
- o If upwind of the incident, evacuate in the upwind direction.

G-5e Coordination Agreements

Rocky Flats has discussed the nature of their facility operations and the type of emergency situations that might occur with the neighboring municipalities. Those that may be called upon to provide emergency services will be provided with a copy of the Contingency Plan.

G-6 Plan Implementation

G-6a Organizational Structure

The first response to a spill incident is to occur on an opera-

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tional personnel level. If operational personnel response is not sufficient to control the emergency situation, the Emergency Coordinator will determine the appropriate action.

G-6b Plan Review and Update

The Plan will be reviewed and amended, if necessary, whenever the following occurs:

- o The facility permit is revised.
- o The Plan fails in an emergency.
- The hazardous waste management units change in design, construction, operation, maintenance, or other circumstances in a way that materially increases the potential for fires, explosions, or releases of hazardous wastes or hazardous waste constituents, or changes in the response necessary in any emergency. in any emergency.

The Plant Manager and the DOE Area Manager of Rocky Flats are the authorized persons responsible for changing or amending the Contingency Plan. Changes will be made by the direct replacement of outdated pages with new pages containing the additional or modified information. Old pages will be removed and discarded. Replacement pages will be issued to the agencies/organizations to which copies of the Rocky Flats Contingency Plan have been distributed to ensure that all copies of the plan have been updated.

G-6c Personnel Training

Rocky Flats has an established personnel training program under the direction of the Hazardous Waste Coordinator with assistance from the off-site training center and training department. All employees associated with hazardous waste management are trained in emergency response procedures. Operations supervisors are trained in emergency response procedures applicable to hazardous wastes in their work area.

G-6d Recordkeeping

Records on hazardous waste activities and personnel training are maintained until closure of the facility.

As required by CHWR 264.56(j), any emergency event (e.g., fire, explosion, etc.) that requires implementing the Plan will be reported in writing within 15 days to the Department.

G-7 Emergency Services Documentation

Letters documenting agreements and/or understandings with potential emergency service contractors are found on file at RF.

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H - PERSONNEL TRAINING

SECTION H

PERSONNEL TRAINING

The information contained in this section oulines the personnel training program for Rocky Flats' hazardous waste management facility in accordance with the requirements of CHWR 100.41 (a)(12) and 40CFR 270.14(b)(12).

H-1 GENERAL INFORMATION

The majority of the personnel at Rocky Flats do not have contact with hazardous wastes. Certain personnel have only indirect contact with hazardous wastes. This group includes: operating supervisors, office personnel, and security personnel who enforce the security measures discussed in Section F and who might be involved in an emergency situation. These personnel do not have any responsibilities for the handling or ultimate dispostion of hazardous wastes. Employees directly involved with hazardous waste pickup, transfer, handling, etc., are the generators and drivers. These employees will be trained through a Rocky Flats training program designed to meet the regulations of CHWR CFR 264.16.

H-la JOB TITLES AND DUTIES

Each manager of specific processes will assure that his personnel fully understand all duties and responsibilities. In addition, each employee is responsible for learning general hazardous waste requirements at the Rocky Flats facility.

Table H-l summarizes the duties and responsibilities of personnel who are involved with the Rocky Flats hazardous waste management.

H-1b TRAINING CONTENT AND FREQUENCY

The Hazardous Waste Coordinator presents a RCRA Training Program to all employees within Waste Operations and to other designated employees that have a significant role in waste management. Managers are notified when employees that handle or manage hazardous waste are due to receive classroom training to supplement their onthe-job training, thus complying with the RCRA regulations. The classroom instruction is presented in one 2.5 hour session that overviews hazardous waste management, introducing the vocabulary, handling/disposal procedures, and personnel protection safety equipment. A RCRA training film and lecture regarding waste specific to Rocky Flats are also presented during the classroom program. Table H-2 provides an outline of the RCRA classroom training program.

TABLE H-1

Responsibilities and Duties of Employees Involved with the Rocky Flats Hazardous Waste Program

Waste Operations Manager

The Waste Operations Manager is responsible for final approval of all hazardous waste shipments. He delegates his authority to the Hazardous Waste Coordinator to ensure that all wastes are analyzed, handled, and treated in a safe and efficient manner. He also ensures that all outgoing shipments are sampled and sent to the designated disposal facility.

Hazardous Waste Coordinator

The Hazardous Waste Coordinator is responsible for proper execution of hazardous waste activities at the Rocky Flats facility. He coordinates with the Environmental Analysis and Control Section to handle all wastes in an efficient and safe manner. He is responsible for ensuring that the waste storage areas are kept clean and handles all records that track the wastes at Rocky Flats. He ensures that all out-going shipments are sampled.

TABLE H-1 (continued)

Environmental Analysis and Control Section (EA&C)

The Environmental Analysis and Control Section is responsible for screening all waste processing request forms. The Environmental Analysis personnel notify the generators if any further tests must be completed on the waste and the proper disposal location. The EA&C personnel coordinate with the Hazardous Waste Coordinator to determine the handling procedures for each waste item. In case of an emergency incident, he is responsible for maintaining environmental standards.

Generators

Each employee who is a generator of hazardous waste shall be responsible for the proper handling and containment of waste materials that his process handles. In addition, all handlers shall be responsible for:

- o Reporting any release of hazardous waste that may endanger the health and safety of facility personnel.
- o Notifying the Hazardous Waste Coordinator for pickup of waste materials bulked or solidified, in accordance with the established waste disposal procedure.

TABLE H-1 (continued)

Drivers

Rocky Flat's drivers must be familiar with the requirements in the On-Site Transportation of Radioactive and Other Hazardous Materials Manual. Rocky Flats' drivers only transport non-manifested hazardous wastes on the Plant site.

Emergency Coordinator

The Emergency Coordinator (EC) is responsible for the effective performance of the emergency organization and coordination of all emergency activities. The EC or his alternate(s) is available 24 hours per day, seven days per week.

Rocky Flats Fire Department

The Rocky Flats Fire Department is available 24 hours per day, seven days per week. All assigned personnel on the team are trained to cope with:

- o Hazardous waste spills and releases.
- o Fire and/or explosions.
- o Personnel injuries.

TABLE H-1 (continued)

Industrial Hygiene Personnel

The Industrial Hygiene personnel, as part of the Rocky Flats Safety Team, are responsible for the environmental and occupational health of facility personnel.

Traffic Manager

The Traffic Manager is responsible for certifying that the off-site shipments of hazardous wastes meet DOT and RCRA requirements.

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TABLE H-2 Training Program - Hazardous Waste

- o Introduction
 - RCRA hazardous waste storage facility requirements
 - RCRA overview videotape
 - Rocky Flats contingency plan and emergency response procedures
- o Waste Handling Procedures
 - Generator's responsibilites; Rocky Flats waste chemical disposal procedures
- o Classification and Labelling of Hazardous Wastes
 - Hazardous waste identification
 - Review of wastes handled
 - DOT regulations
- o Flammable Liquid Wastes
- o Corrosive Wastes
 - Common types of corrosives
 - Harmful effects of specific corrosives

TABLE H-2 (continued)

- o Toxic Wastes
 - Types of toxic reactions
 - Routes of entry
 - Common toxic wastes
 - Precautions for handling toxic wastes
- O Reactive Wastes
 - Major groups of reactive wastes
 - Common reactive wastes
- o Emergency Response Procedures

Employees are also given on-the-job training to further increase their knowledge of hazardous waste management practices. This training includes hands-on utilization of operating equipment, with particular emphasis on proper operation of personnel safety equipment. All facility personnel take part in periodic (annual) reviews of this initial training program.

The RCRA classroom training program was implemented during February of 1985. However, prior to this date the Hazardous Waste Coordinator had been providing a DOT Hazardous Materials training class for approximately five years. This course contained a significant amount of information similar to the new RCRA Training Program (see Appendix H-1). Therefore, the RCRA Training Program and the DOT Hazardous Materials Class are separately taught annually and bi-annually, respectively.

H-1c HAZARDOUS WASTE COORDINATOR

The Hazardous Waste Coordinator, has knowledge in all aspects of hazardous waste management. He is knowledgeable in environmental regulations and is a DOE-certified instructor of Hazardous Material Safety.

H-1d RELEVANCE OF TRAINING

The primary source of relevant training for specific positions is received through on-the-job training. All employees' shift supervisor or foreman will periodically evaluate the employees understanding and ability to perform the assigned tasks. If an employee is found to be deficient, he is required to repeat the training course work and/or work under direct supervision until found to be knowledgeable.

In addition, the Rocky Flats hazardous waste management personnel are required to attend classes and training programs that will typically include the following topics:

- o RCRA Training Program
- O DOT Hazardous Materials Class
- o Rocky Flats Contingency Plan and Emergency Response
 Procedures
- o Hazardous Waste Monitoring
- o Emergency Notification Procedures
- o Basic First Aid
- o CPR
- Location of emergency eye wash and safety showers (building specific)

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H-2 TRAINING FOR EMERGENCY RESPONSE

All employees associated with hazardous waste management are trained in emergency response procedures, as can be seen in the training requirements outlined (see Table H-3). Operations supervision and laboratory personnel are trained in emergency response procedures applicable to their particular departments, including prompt notification of the EC. The primary emergency response procedure addresses spill response, although procedures for fires and other incidents are discussed. The emergency response training program is designed to ensure that personnel not only handle hazardous wastes in a safe manner, but also properly respond to emergency situations. The program trains hazardous waste management personnel to maintain compliance under both normal operating conditions and emergency conditions.

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Training elements addressing non-routine and emergency situations (unscheduled shutdowns and startups related to storms, power outages, fires, explosions, and spills) include the following:

- o Familiarity with the Contingency Plan (Section G).
- o Emergency communication procedures.
- o Response to fires or explosions.
- Shutdown of operations and power failure procedures.
- o Procedures for evacuation of nearby areas.

In addition to the hazardous waste management personnel, the Rocky Flats Fire Department has been designated for response to all fires and other general emergencies. This is a fully trained fire department which is prepared to handle any emergency on the plant site. The classroom training is required for introductory training.

TABLE H-3 Personnel Training Requirements

Position	RCRA Hazardous Waste Facility Require- ments	Emergency Response and Release Prevention	Inspections, Record- keeping, and Reporting	Fire Extin- guisher Use, Fire Safety and Rescue, Use of Protective Equipment and Clothing	Basic First Aid
Operations Manager	x	x	x		
Environmental Analysis		x	x	x	
Hazardous Waste Coordinator	x	x	x	x ·	
Industrial Hygiene Personnel	x	x	x	x	
Emergency Coordinators	x	X		x	
Generators		x	x		
Drivers		x			
Security Personnel		x		x	x
Fire Department	x	x		x	x
		H-13			

H-13

H-3 IMPLEMENTATION OF TRAINING PROGRAM

The Training Program is assembled and taught annually by the Hazardous Waste Coordinator. All personnel handling hazardous wastes continue to be trained at the time of this submittal.

The training information and expertise is provided and exchanged with close coordination from the following departments:

- o Rocky Flats Fire Department
- o Industrial Hygiene
- o Environmental Analysis and Control Section.

The course contains and is taught following the outline presented in Table H-2.

New employees hired to work at Rocky Flats or reassigned employees will not work unsupervised with hazardous wastes prior to completion of the appropriate training program.

- o New employees must be fully trained within six months after their service start date with Rocky Flats.
- o Employees recently reassigned will be fully trained as to their new responsibilities within six months after their assignment date.

o All employees will receive training material, attend appropriate classes and sign Acknowledgement of Training Form shown in Figure H-1.

The hazardous waste management personnel are required to take a Hazardous Waste test (see Appendix H-2) upon completion of the classroom material. A grade of >80% is considered successfull completion of the program. In the event an unsuccessful grade is obtained, the employee is required to repeat the training until a successful grade is obtained.

In addition to the RCRA Training Program, Liquid Waste Processing maintains training checklists and examinations for workersinvolved with liquid waste processing (see Appendix H-3).

All records documenting the job title for each position, job descriptions, names of employees, and successfully completed training programs (both introductory and review) are kept on-site. A typical form to be used to document initial completion and the annual update and review sessions of the training program for each employee is shown in Figure H-2. These records will be kept until closure of the facility for current employees, and for three years from the date of the individual employee's termination for former employees.

FIGURE H-1

Example of Rockwell Sign-Off Sheet

ROCKWELL INTERNATIONAL ROCKY FLATS SITE

NAME	TITLE	SIGNATURE	DATE
C. E. Wickland	Manager, Waste Operations		
J. A. Hayden	Hazardous Waste Coordinator		
R. D. Gaskins	Manager, Liquid Waste Operations		
A. C. Ficklin	Manager, Solid Waste Operations		·
J. L. DiRocchi	Manager, Liquid Waste Processing, Bldg. 374		
R. E. Brady	Manager, Waste Water Projects		
G. T. Hewitt	Manager, Liquid Waste Processing, Bldg. 774		

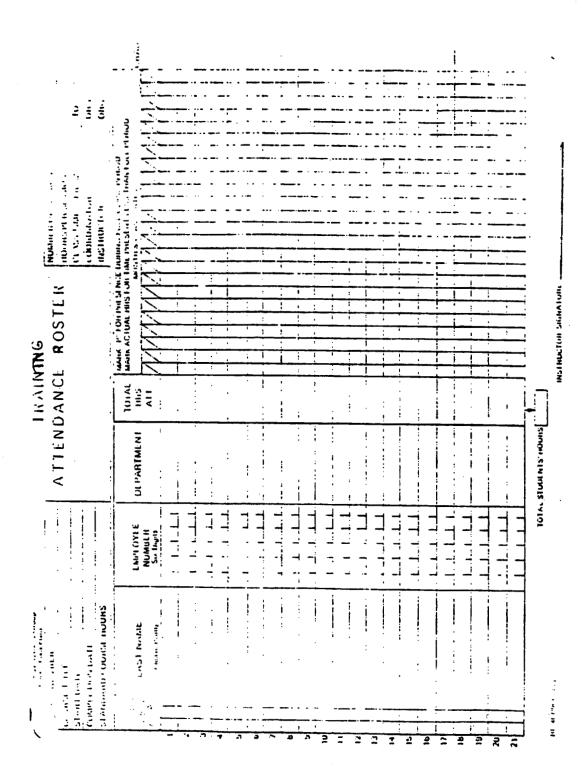


FIGURE H-2 Training Attendance Roster

SECTION I

CLOSURE PLAN

SECTION I

CLOSURE PLAN

This section is submitted in accordance with the requirements of CHWR 264 Subpart G and 40 CFR 270.14(b)(13) and (15).

I-1 Introduction

This Closure Plan is designed to meet all of the requirements of CHWR 264 and 40 CFR 264.112 through 115, 264.142 and 143, 264.147 and 264.149.

I-la Background

Rocky Flats operates a hazardous waste storage and treatment facilities for on-site hazardous waste generators. All hazardous waste generated on-site are recycled, treated, or disposed of off-site.

The Rocky Flats Plant covers almost 11 square miles of Jefferson County, Colorado. The facility is centered at 105° 11' 30" west longitude, 39° 53' 30" north latitude. As shown in Figure B-1, this location is 16 miles northwest of Denver and 9 to 12 miles from the communities of Boulder, Golden and Arvada. It is bounded on the north by State Highway 128, on the west by State Highway 93, on the south by State Highway 72, and on the east by Jefferson County Highway 17. Figure B-2 is a map of the immediate vicinity of the Rocky Flats Plant.

Situated at an elevation of about 6,000 feet, the Plant is on the

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eastern edge of a geological bench known locally as Rocky Flats. This rocky bench, which is about 5 miles wide in an east-west direction, flanks the eastern edge of the abruptly rising foothills of the Rocky Mountains. The Continental Divide is approximately 26 miles west of the Plant.

The Rocky Flats Plant is a Government-owned facility with the primary mission of producing plutonium components for nuclear weapons. Production activities involve the fabrication of plutonium, uranium, beryllium, and stainless steel parts. Other activities include chemical processing to recover plutonium from scrap material, R&D work in metallurgy, machining, assembly, nondestructive testing, coatings, remote engineering, chemistry, and physics. Parts made at the Plant are shipped elsewhere for final assembly.

Research and engineering programs that supporting these activities involve chemistry, physics, materials technology, ecology, nuclear safety, and mechanical engineering.

Approximately 102 structures on the Plant site contain about 214,000 square meters (2.29 million square feet) of floor space. Of this space, major manufacturing, chemical processing, plutonium recovery, and waste treatment facilities occupy about 170,000 square meters (1.83 million square feet).

Major laboratory and research buildings occupy about 13,850

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square meters (149,000 square feet). The remaining floor space is divided among administrative, utility, security, warehouse storage, and construction contractor facilities.

I-lb Regulatory Requirements

In accordance with regulations promulgated under the Resource Conservation and Recovery Act (RCRA) and Colorado Hazardous Waste Management Regulations, Rocky Flats has developed a detailed closure plan for the hazardous waste facilities at their site.

The Closure Plan for a hazardous wste management facilities is required by RCRA and the Colorado Hazardous Waste Management Regulations. The Plan must include the following:

- A description of how and when the facility will be partially and/or finally closed. (Partial closure consists of those parts of the facility that are to be closed because their useful life has been expended.)
- Estimate of the maximum inventory of wastes in storage at any time during the life of the facility (for development of the closure cost estimate).
- Description of steps needed to decontaminate the 0 facility during closure.
- 0 Estimate of the expected year of closure and a closure schedule, including itemization of activities that will allow tracking of closure progress.

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O Notification and submission of the Closure Plan to the Environmental Protection Agency (EPA) Regional Administrator and the Colorado Department of Health (CDH) at least 180 days prior to initiation of closure.

- o Decontamination steps at the end of closure for all equipment used during closure.
- o Proposed procedures for certification of closure activities by the facility and an independent registered professional engineer.

During the lifetime of the facility, Rocky Flats is required to amend the Plan whenever changes in operating procedures or facility design affect the Plan, or whenever there is a change in the expected year of closure.

The Plan must address the applicable requirements for the specific types of waste storage facilities at the location. The specific criteria include provisions for the following:

- o Removing of all hazardous wastes and hazardous waste residues from confinement structures.
- Minimizing the potential for post-closure migration of contaminants from the facility via groundwater, surface water, and air.

I-lc Description of Treatment and Storage Facility Operations
The hazardous waste storage facilities at Rocky Flats currently
consist of a hazardous waste storage containers, a gas storage

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shed, silver recovery systems, fluidized bed incinerator, and miscellaneous bench scale chemical detoxification facilities. Containerized wastes are delivered to the Rocky Flats storage area site via Rocky Flats trucks and off-loaded at the container storage area. When sufficient amounts of compatible wastes have accumulated in the storage area, the wastes are sent off-site for recycling or disposal.

I-2 Closure Concept and Plan

I-2a Basis of Closure

The Closure Plan for the Rocky Flats hazardous waste treatment and storage facility is based on the following key steps:

- Removal of all wastes from the containerized waste storage area cargo containers for recycling or off-site disposal at appropriate facilities.
- o Decontamination of plant equipment and facilities used for storage and handling of hazardous wastes.
- o Inspection of storage facilities for any hazardous material residues.
- O Certification of completion of closure by Rocky Flats and an independent registered professional engineer.

Upon site closure, all wastes will be processed and then shipped to approved off-site facilities for recycling or disposal.

I-2b Partial Closure Activities

Partial closure consists of those parts of the facility that are

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to be closed because their useful life has been expended. If any of the facility parts (i.e., the containerized waste storage area cargo containers) were to be closed, the closure procedures would be the same as specified elsewhere in this Plan.

I-2c Maximum Waste Inventory

The maximum waste inventory at the Rocky Flats facility is broken down as follows:

Inventory Location

Maximum Capacity

Containerized waste storage building

616,000 gallons (112 55-gallon drums)

I-2d Inventory Removal and Disposal

The hazardous waste inventory will be located in the following area:

Containerized waste storage area cargo containers.

As now planned, the hazardous waste treatment and storage areas will continue operating as long as Rocky Flats is operating, and currently there are no plans to close the Plant in the foreseeable future.

A Closure Plan for all existing facilities and equipment (described in detail in Section D) is included in the following text. All waste materials would be disposed of in the usual manner. The facilities and equipment would be decontaminated and used for nonhazardous activities or disposed of off-site.

I-2f(5) Partial Closure Refer to I-2e.

I-2f(6) Final Closure Facilities

Thirty days prior to beginning facility closure all storage area inventories would be removed in the same manner as during normal operations. The inventories would be reclaimed and/or disposed of in accordance with local, State, and Federal rules and regulations. The following general procedures would prevail:

- All containers would have been removed from the storage area prior to closure of the area. No containers of hazardous wastes would be within the storage area when closure of the area begins.
- o Facilities would be decontaminated by steam cleaning.
 - Personnel wearing properly prescribed safety apparel (OSHA) would clean the storage structure walls, ceilings, floors, and pan. Working from the top to the bottom, all surface areas would be thoroughly cleaned and decontaminated.
 - All debris, waste residues, and disposal cleaning utensils would be managed as hazardous wastes and would be disposed of at RCRA, a permitted off-site facility.
 - After all surface areas have been cleaned and decontaminated, Rocky Flats would perform "wipe tests" on the surface areas of the structures.

These wipes would be analyzed by the on-site laboratory for hazardous constituents based on the types of wastes that were stored within the area. Sampling and testing would be conducted in accordance with ASTM/U.S. EPA methods and procedures.

- If an area is found to be contaminated, the surface areas would be cleaned and retested.
- After decontamination is complete, the area would be inspected by an independent professional engineer and closure certification obtained.
- Closure certifications would be submitted as described in Subsection I-2k.

The closure procedures described within this section would be completed within 30 days by Rocky Flats personnel using equipment and supplies located on the site.

I-2f(7) Partial Closure

Rocky Flats does not anticipate that any portion of the hazardous waste storage area will involve partial closure.

I-2g Decontamination

All equipment used during closure activities would be decontaminated in a safe and professional manner by trained, qualified hazardous materials technicians using procedures and safety gear in accordance with OSHA requirements. All contaminated surfaces of vehicles and equipment would be scrubbed with solutions designed to remove contaminants. All surfaces would then be rinsed with water. This process would be repeated as often as necessary to ensure complete surface decontamination.

All decontamination residues and disposal supplies wouldbe treated as hazardous and disposed of in accordance with all local, State, and Federal regulations.

All personnel decontamination activities would be administered by the Hazardous Waste Coordinator. All personnel would be instructed as to the required safety equipment and decontamination procedures to be used during closure.

Day-to-day hazardous waste handling operations and closure activities may result in the spillage of hazardous materials. These occurrences will be handled by immediately excavating the contaminated aggregate or soil and sending it off-site for disposal at a RCRA permitted facility. At the completion of site closure activities, a series of surface soil samples would be taken in order to check for contamination of access roads, parking areas, waste handling areas, and sediment ponds. Contaminated soils would be excavated and transported to a RCRA permitted facility for disposal.

I-2h Closure Certification and Inspection

A certification inspection, required by 40 CFR 264.115, would be performed by an independent registered professional engineer and would be submitted to the EPA Regional Administrator and Colorado Department of Health, indicating that the facility had been closed in accordance with the Closure Plan.

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I-2i Institutional Requirements

Sections 40 CFR 264.119 and 120 of RCRA relate to notification of the local land authority and notice in deed to the property. These regulations apply only to disposal facilities and need not be addressed for storage and treatment facilities.

I-3 Closure Cost Estimate

In accordance with 40 CFR 264.140 (c) and CHWR 266.10 (c) Rocky Flats is exempt from closure cost estimate requirements.

I-4 Liability Insurance

Rocky Flats is owned and operated by the U.S. Government. Insurance certification is not needed because the U.S. Government is self-insured by definition and legislative authority/statute.

I-5 Financial Assurance Mechanism

See Section I-4.

I-6 Plan Review and Update

Copies of the Rocky Flats Closure Plan are kept on-site in the main office. The Colorado Department of Health, Denver, and EPA Region VIII, will also be provided with copies.

The Plant Manager of Rocky Flats is the authorized person responsible for updating the facility Closure Plan. The Plan will be reviewed and amended annually. Other changes in the Plan will also be made at that time if required.

Changes will be made by the direct replacement of outdated pages

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with new pages containing the additional or modified information. Old pages will be removed and discarded. Replacement pages will be issued to the agencies/organizations to which copies of the Rocky Flats Closure Plan have been distributed to ensure that all copies of the Plan have been updated.

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SECTION J

(RESERVED)

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K

SECTION K
CERTIFICATION

SECTION K

CERTIFICATION*

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this document and all attachments and that, based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

Date: November 1, 1985

Signature

d. L. Sellows

Acting Area Manager UNITED STATES DEPARTMENT

OF ENERCY

Signature:

J.C. Dorr

Vice President and General Manager ROCKWELL INTERNATIONAL

CORPORATION

Signature

L. T. Hatch, P.E.
Project Director
WESTON DESIGNERS
AND CONSULTANTS

See Section A, Form 1, Attachment 2

Volume 2

Resource Conservation and Recovery Act

PART B PERMIT APPLICATION CODO78343407

Submitted by

Department of Energy's Rocky Flats Plant Golden, Colorado

to

Colorado Department of Health Waste Management Division Denver, Colorado

1 November 1985

Prepared by

Roy F. Weston, Inc.
938 Quail Street
Denver, Colorado 80215
In Association with
Chen and Associates, Inc.

VOLUME 2

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APPENDIX H-3	Liquid Waste Training Material

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APPENDIX C-1

EXAMPLES OF COMPLETED WASTE PROFILE SHEETS

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	WASTE MANIFEST	1_Generator's CODO7834		Manifest Procument No.	2. Page 1	is not require	n the shaded area id by Federal law.
	enerator's Name and Mailing Address	Booker Flore	21		A. State Me	initest Docume	nt Number
	Rockwell International, PO Box 464, Golden, CO		Lianc		B. State Ge	nerator's ID	
	enerator's Phone (303) 497-2				{		
	ransporter 1 Company Name		6 US EPA 10 1	Number		ensporter's ID	
	Oil & Solvent Process Co	moany	COD9805911				03-289-4827
7 Tr	ransporter 2 Company Name	,	8 US EPAID 1	Number	ļ	insporter's ID	
9 D4	esignated Facility Name and Site Addre	44	10. US EPAID	Number	F. Transpor		
	Oil & Solvent Process Co				0. 0.0.0	only a ID	
	9131 E 96th Ave.				H. Facility's	Phone	
<u> </u>	lenderson, CO 80640		COD9805911			89-4827	
11. U	S DOT Description (Including Proper St	nipping Name, Haza	ard Class and ID Numb	12. Conta	T T	13. 14. olai Unit	Waste No.
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	T.	UNIFORM HAZARDOUS WASTE MANIFEST. 1. Generator's CODO783	US EPA ID No.	Manifest cument No.	2 6	_ in		n the shaded areas d by Federal law.
	3.	Generator's Name and Mailing Address	•		A. S	tate Manife	t Documer	nt Number
П		Rockwell International, Rocky Flats	Plant		<u> </u>			
11		PO Box 464, Golden, CO 80401			8. S	itate Genera	tors ID	
П		Generator's Phone (303) 497-2377			<u> </u>			
11	3.	Transporter 1 Company Name	6 US EPA ID Numi	ber		tate Transp		
11	늣	Oil & Solvent Process Company Transporter 2 Company Name	8 US EPA ID Numi			tate Transp		3-289-4827
H	l''	The state of the s	1	~,		ransporter's		·
Π	9.	Designated Facility Name and Site Address	10. US EPA ID Numt)er		tate Facility		
Ш		Oil & Solvent Process Company			l			·
11	1	9131 E. 96th Ave.			H. F	acility's Pho	ne	
Ш	_	Henderson, CO 80640	COD980591184			03-289-		
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7	b.		(36518)	Co			21	
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	_	Flammable Liquid (NA1263)	7 0001	1 10	DM_	-		
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		3 Alcohols - d%; p!i = 6.8 - 9		1 1				i
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IN THE EVENT OF A SPILL, CONTACT TO RESPONSE CENTER, U.S.: COAST GUARD	HE NATIONAL	-13	Anna Carlo	125/12 Pro	<u> </u>			239
DESTURASE LEMIEN. U.A. LUAZI MILAND	1-500-424-5552***	BAR LAN ABINDARY						A
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GENERATOR GENERATOR MUST COMPLETE) 2 Name Rockwell International	3 Designated TSD Facility (Aut approved state program or lede Name Oil and Solvent Proces	es Company	4 Atternate TSD Facility Name Oil and Solvent Process Co	19-84 mpany
EPA # C O D O 7 8 3 4 3 4 10 7 Address PO Box 464 Phone 303-497-2377	Address 9131 E. 96th Avenue	0 5 9 1 1 1 8 4 Phone (203) 289-4827	EPA # C A D 0 0 8 3 Address 1704 W. 1st Street Phon	(213) 334·5117 ·
City, State, Zip Golden, GO 80401	City, State, Zip Henderson Co		City, State, Zip Azusa, California 91	702
5 U.S. DOT PROPER SHIPPING NAME	·	MEIGHTE UNITS	NUMBER OF CONTAINERS 7	※
WASTE FLAMMABLE LIQUID, N.O.S.		25 gallons	TYPE: DRUMS DBAGS DCARTO	48
WASTE DOOL		ST	TANK TRUCK DUMP TRUCK	*
6 Waste Category 66 7 Ext. Haz. \	Waste Permit No. N/A	8 Generating Pr	ocess Equipment Cleaning	¥
A Aliphatics 90	NANGE OWER UNITS	LIST COMPONENTS:	CONCENTRATION RANGE UPPER LOWER	UNITS
B. Ketones 8 C. Alcohols 4	<u>· 3</u> ∫ 20 % : □ ppm.	F		
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10 WASTE PROPERTIES: pH		re 🗌 Sensitizer 🔲 Carcin	ogen/Mutagen :	•
11 PHYSICAL STATE: Solid W Liquid Studge State 12 SPECIAL HANDLING INSTRUCTIONS: W Gloves W Goggle GENERATOR CERTIFICATION: This is to certify that the above named regulations of the Department of Transportation and EPA. IN THE EVENT OF A SPILL, CONTACT THE NA	urry Gas Other BS Respirator S Other_Dr materials are properly classified, describ	ums not leaking - Bo	ings tight	ing to the applicable Y-2-54 Date Shipped
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NERATOR (GENERATOR MUST COMPLETE)	3 Designated TSD approved state p	olvent Pro	cess Compa	ny .	Name Oll and Solv		•
EPA # C 0 D 0 7 8 3 4 3 4 0 Address PO Box 464 Phone 303-497-2377	7 EPA S C O Address 9131 E.	D 9 (B 0 5 9	1 1 1 8 p 03) 289-4827	Address 1704 W. 1st	O O B 3	0
City, State, Zip Golden, CO 80401	City, State, Zip_1	lenderson			City, State, Zip Azus	a, California 9170	2
S U.S. DOT PROPER SHIPPING NAME	HAZIND BLASS	·18784	ON VOCUME	UNITS	NUMBER OF CONTAINERS	S 4	
WASTE Planmable Liquid NOS WASTE DOOL	Flammable 2	1993 ,	250 ESI.	Gallon	TYPE: W DRUMB D I	AGS CARTONS	
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A. Aliphatics 90 B. Ketones 8 C. Alcohols 4 D. Aromatics 10 10 WASTE PROPERTIES: pH 7 Toxic 13 Flammable 11 PHYSICAL STATE: Solid 25 Liquid Sludge 18 12 SPECIAL HANDLING INSTRUCTIONS: 26 Gloves 25 Goggli	SO SO WAS SO	nt Rea	F F G Non-Har ctive	components: tardous Materia sitizer Carci	CONCENTIUPPER 1 35-55 1 Topon/Mulifuen Dunhgs tight	RATION RANGE	UNI
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IF WASTE IS HELD FOR DELIVERY ELSEWHERE, SPECIFY THE DESIGNATED TSD FACILITY:

22 Designated TSD Facility Name

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City, State, Zip PO Box 464, Golden, Ci) 20401	City, State, Zlp	Man Cir	y, Colorade	0 80022	City, State, Zip	Azusa, Ca	lifornia !	91702
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waste Flammable Liquid, n.o.s.	Flamable	1493	2,750	Gallons	TYPE: DRUM	BAGE C	CARTONS	200
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CITY, STATE, ZIP Adam City, Colonedo S0022

!2 Designated TSD Facility Name.....

TSD FACILITY (FACILITY OPERATOR MUST COMPLETE)	21 HANDLING OR DISPOSAL MI	ETHOD:
7 NAME OIL & SOLVENT PROCESS COMPANY 18 QUANTITY (If Memured)	Recycling for Customer	
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23 Signature of Authorized Agent and Title

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GENERATOR (GENERATOR MUST COMPLETE) 2 Name Recikvell International EPA + C + O + D + O + 7 + C + 3 + 4 + C + 7	3 Designated TSD Facility (Author approved state program or federal Name OIL & SOLVENT I	at program.) PHOCESS CONTAIN	4 Alternate TSD Facility OIL & SOLVENT PR	
Address Rocky Flats Plan: Phone 303-497-2 City, State, Zip. PO Box 464, Golden, CO 80401	377 Address 7130 Elm Stree	et Phone 303) 289-	4827 Att. 1704 W. 1st Stre	et : Phone 213) 334-
5 U.S. DOT PROPER SHIPPING NAME	City, State, 210	WEIGHT	NUMBER OF CONTAINERS 1	TOTAL 91/UZ
WASTE Trichlorocthylene (RO 1000/454) WASTE FOO2	CHIR-A 1710	52 Gallons	TYPE: MORUMS DBAGS DE TANK TRUCK DOUM	CARTONS PTROCK
CONCENTRA	ATION RANGE	8 Generating Pro	Cleaning equipment	TION MANGE
SA Trichloroethylene 35	LOWER UNITS	LIST COMPONENTS:	UPPER	LOWER UNITS
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11 PHYSICAL STATE: Solid DLIGUID Sludge Shrin	Hespirator, Other Bund	n Flaht - drim not	feaking 1-de	
GENERATOR CERTIFICATION: This to certify that the above applicable regulations of the Department of Transportation and EP. IN THE EVENT OF A SPIL CONTACT—THEN		Ified, described, packaged; mark	ed, labeled, and are in proper condition for	or tradiportation according
RESPONSE CENTER, U.S. COAST GUARD 1.8	00-424-8802 13 13 13 13 13 13 13 13 13 13 13 13 13	Authorized Agent and Title Da	lices M. Krien Traffic "	E 12/15/81
TRANSPORTER (HAULER MUST COMPLETE)	CONTRAIN	EPA NO 10 10.70"	15 PICK-UP DATE 2	
ADDRESS 7130 Elm Street CITY, STATE, ZIP Adams City, Colorado		16 Signature of Authorized	Agent onto Title	Date 12/15/ET
TSD FACILITY (FACILITY OPERATOR MUST COM 17 NAME OIL & SOLVERT PROCESS COMPANY 18 EPA NO. C O D O O 6 9 5 1 7	QUANTITY (If Measured)		21 HANDLING OR DISPOSAL M Grecycling for Customer	ETHOD: Received
PHONE NO. 303) 289-4827 20 INDICATE ANY SIGNIFICANT DISCREPANCIES BETWEEN MA			**************************************	S DEC 21'81
To be measured and evaluate IF WASTE IS HELD FOR DELIVERY ELSEWHERE, SPECIFY TO	ted at the Azusa, CA.	facility,		D. N. Kries
22 Designated TSD Facility Name. OIL & SOLVER	T PROCESS COMPANY	Täxu-	EPA NO. 1 C A D O O E	3 3 7 0 2 9 0
Signature of Au	thorized Agent and Title	<u> </u>	Date Accepted	- X

Copy 1-WHITE: TSD Facility Keeps (Send Copy to DOHS) Copy 2-YELLOW: To Transporter from TSDF Copy 3-PINK: To Generator from TSDF Copy 4-GOLDENROD: Generator Keeps (Send Copy to F

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WASTE MALIFEST

1 Manifest 428 - 99839

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GENERATOR (GENERATOR MUST COMPLETE)	3 Designated TSD Facility (Author		Z ALI	4
2 Name Rockwell International	approved state program or feder		Alternate TSD Facility Name GYL & SOLVENT I	PROCESS COMPART
EPA . 1 (10 10 10 17 18 13 14 13 14 14 17 1		0,6,9,5,1,7,		8 1 3 1 0 1 2 1 9 1 0 1
Address Rocky Flets Hant Phone 303-197-257			4827 Address 1704 W. 1st St.	ret Phone 213) 334-
City, State, Zip. PO Box 464, Golden. Co. 60401	City, State, Zip Adams CLt	y, Colorado 80022	City, State, Zip Azusa, Cn1	
5 U.S. DOT PROPER SHIPPING NAME	U.S. DOT UN/NA	WEIGHT OR VOLUME UNITS	NUMBER OF CONTAINERS	
WASTE HAZAR GOUS Waste, Ligger . H.O.S.	OR6 E 9132	200 Sallons	TYPE DRUMS BAGS C	CARTONS MP TRUCK
WASTE FOO2	·		OTHER	
6 Waste Category 63 7 Ext. Haz, Waste	Permit No. 3/A	8 Generating Pro	ces Cleaning Parts	·
CONCENTRATI		LIST COMPONENTS:	CONCENTRA	ATION RANGE LOWER UNITS
LIST COMPONENTS: UPPER	LOWER UNITS	F		Ox Or
1771	D% Øppm.	F	*	Ox Oc
C C	□ □ □ □ ppm.	G		
D. (27.1)	□% □ppm.	Non-Hazardous Material	<u> 5–30 </u>	£.
10 WASTE PROPERTIES: pH 6.5 Toxic Flammable [Corrosive/Irritant	e □Sensitizer □Cercinoger	Mutagen	· ·
11 PHYSICAL STATE: Solld DLiquid Sludge - Slurry			7 Transport	
12 SPECIAL HANDLING INSTRUCTIONS TELOGOGIES	Respirator. Other <u>Bur</u>	ng tight - drums not	eaking	
GENERATOR CERTIFICATION: This is to certify that the above n		side described perhaps mad	red daheled and are in groner condition	for transportation according to
applicable regulations of the Department of Transportation and EPA.	Swid waterials are broberry cias	silied, beschoed, beckeyed, mail	ed, lauerell, with any in proper comments.	. 1
IN THE EVENT OF A SPILETCONTACT THE NA	TIONAL 13 Aul	un True q	home,	\$12/15/81
RESPONSE CENTER, U.S. COAST GUARD 1-800	-424-8802 Signature o	Authorized Agent entitle	lores M. Kring, Traffic	Date Shipped
TRANSPORTER (HAULER:MUST:COMPLETE)			15 PICK-UP DATE	
ATT & SATURDER PRACESS CO	MPANY	Cho do	0,0,0,6,9,5,1,7	1 - Fist Day D
14 THANSPORTER NAME	_, ,	2,7,10,7		
ADDRESS 7130 Blu Street Adams City, Coloredo 80		16 Signature of Authoriza	TARRETT AND THE	Date Date
CITY, STATE, ZIP BURNEY OLLY, COLUMN		7		
TSD FACILITY (FACILITY OPERATOR MUST COMP	LETE)	- イドノー	21 HANDLING OR DISPOSAL	метно й: Received
17 NAME CIL & SOLVENT PROCESS COMPANY 18 0		···	_ Recycling for Customer	Ž Zoodii o
EPA NO. IC 10 1D 10 10 10 16 19 15 11 17 11	19 STATE FEE (II Any)		DRecycling	DEC 21'81
PHONE NO. 303) 289-4827			_ Landfill	0002101
20 INDICATE ANY SIGNIFICANT DISCREPANCIES BETWEEN MAN To be measured and evaluated at the	ifest and shipment: L'Azuda, CA' facilit	у	-	D. N. Krieg
IF WASTE IS HELD FOR DELIVERY ELSEWHERE, SPECIFY THE	DESIGNATED TSD FACILITY	:		
22 Designated TSD Facility Name OIL & SOLVENT PM	CHSS COMPANY		_ EPA NO. I. C. J. A. I. D. I. O. I. O.	[3 39 0 2 9 Q
23 10 200	prized Agent and Title	سدد سندن السان سنستان لحف	Date Accepted	

Ple Print clearly, Press Hard.	WASTE N	AFEST	rr mik t	1 Manifest 428 - 108	354
GENERATOR (GENERATOR MUST COMPLETE) 2 Name ROCKMOLL INLAMBLE (GENERATOR MUST COMPLETE)	3 Designated TSD Facility (Ai approved state program or finance OIL & SOLVE	ederal program.)	ENTPANY	4 Alternate TSD Facility Name OIL & SOLVENT P	
EPA - G O O O O O O O O O	77Address 7130 Elm St	reet Pho	303)289-	1) EPA - C A D O O O O O O O O O O O O O O O O O O	ec Phone 213) 33/
5 U.S. DOT PROPER SHIPPING NAME	U.S. DOT UN/NA		UNITS	NUMBER OF CONTAINERS 1	4.
WASTE Ethylone Glycol Monce thyl Ether WASTE (collosolve) 00:1	Combustible 1171	90	Gallons	TYPE: DRUMS DBAGS DTANK TRUCK DDUM	CANTONS P TRUCK
G Weste Colegory 50 7 Ext, Haz. Was	te Permit No		Generating Pro	CONCENTRA	30.
UPPER 9 A Street etner (2) 8.	LOWER UNITS	n. E.—		UPPER	LOWER UNIT:
C	()% [] фог	n, G n, Non-Hazar	dous Material	10-25 %	
12 SPECIAL H. VOLING INSTRUCTIONS ZGloves & Goggles	Gas Other Respirator Other	Bung Light	- drum not	losk[n]	
GENERATOR CERTIFICATION: This is to certify that the above applicable regulations of the Department of Transportation and EPA IN THE EVENT OF A SPILL CONTACT THE-N/RESPONSE CENTER, U.S. COAST GUARD 1-80	named materials-are properly	lassified, described	, packaged, mark	ted, labeled, and are in proper condition t	
TRANSPORTER HAULER MUST COMPLETED 14 TRANSPORTER NAME OIL & SOLVERT PROCESS OF THE STREET OF THE ST	P.PANY PHONE 303) 289-482	EPA NO.	011	15 PICK-UP DATE	LITER MIS CJAM [
TSD FACILITY IFACILITY-OPERATOR MUST COMP 17 NAME OIL & SOLVENT PROCESS COMPANY 18 (EPA NO. C O D O C O 6 0 5 1 7	QUÂNTITY (II Measured)			Recycling	Received
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1F WASTE IS HELD FOR DELIVERY ELSEWHERE, SPECIFY TH 22 Designated TSD Facility Name OIL & SOLVEIT PROCES 23 Canada L	S COMPANY			EPA NO 1 C A D O O	8 1 0 2 9 0

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See (for instructions.	& SOLVENT P.(SS COMPANY	41/3	
Please rint clearly. Press Hard. ML 14'82	WASTE MAN	IFEST	1 Manifest 428 — 01	0759
GENERATOR (GENERATOR MUST COMPLETE) D. M. KRIEG	3 Designated TSD Facility (Authorproved state program or fede		4 Alternate TSD Facility	
2 Name Rockyell International U. W. Milco	Name -011and-Softent	Process Company	Name Oll and Solveni	
EPA . 15 10 10 10 17 18 13 14 13 14 10 17	••••	101619151117		18 13 10 12 19 10 13
Address Racky Flats Plant Phone 303-497-23	77Addrew 7130 Elm Stre	at Phone (303) 28	39-4827 _{Address} 1704 1st Stree	et (213)334-51
City, State, Zip PO Box 464, Golden, CO 80401	City, State, Zip Adams - Git	y Colorado 80022	City, State, Zip Azusa Cal	
U.S. DOT PROPER SHIPPING NAME	U.S. DOT UN/NA HAZARD CLASS ID NO.	WEIGHT OR VOLUME UNITS	NUMBER OF CONTAINERS	,
WASTE Flammable Liquid, N.O.S.	Flanmable 1993	100 Gallons	TYPE: DRUMS DEAGS TANK TRUCK DO	JCARTONS
WASTE DOUL	Liquid		OTHER	IMP TRUCK
6 Weste Category 60 Participation	the Committee and the state of	THE WHOLE BOUNDED	Process Cleaning paint enuis	and the
NeoWie NY H	STORY NO.	世代的に行うでき	"CONCENTE	ATION RANGE
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O		Marie The State of	15-25-604 ×	•
10 WASTE PROPERTIES: pH			mining the second secon	
IT PHYSICAL STATE: Solid Wilk The FERRES			come in the state	
12 SPECIAL HANDLING INSTRUCTION LEGIOVER LE GOOGLE	Respirator Cohes	unes Light - drums	not leaking	:
GENERATOR CERTIFICATION: This certify hat the above applicable regulations of the Departmen can equation and EFA	Party of the same	sified, described, peckeged, n	narked, labeled, and are in proper conditio	n for transportation according to t
applicable regulations of the Department of Panagogation and EFA	AND THE REAL PROPERTY.	1-6.		
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14 TRANSPORTER NAME Off and Solvent Process	Company /2027	EPA NO. LC 10 10	10 10 10 16 19 15 11 17	11 Time ACICE WAN DI
ADDRESS 7130 Flm Street	PHONE (303)289-4827	16 77 Ke Van	Let Driver Mike Jus	heT_ 6/22/82
CITY, STATE, ZIP Adams City Colorado 80022		Signature of Author	ized Agent and Title	Date /
TSD FACILITY IFACILITY OPERATOR MUST COM	PLETE)		21 HANDLING OR DISPOSAL	METHOD:
17 NAME Olla nd Solvent Process Company 18	QUANTITY (If Measured)		Recycling for Customer	
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PHONE NO. (303)289-4827			DLendfill	, 2
20 INDICATE ANY SIGNIFICANT DISCREPANCIES BETWEEN MA	NIFEST AND SHIPMENT:			
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IF WASTE IS HELD FOR DELIVERY ELSEWHERE. SPECIFY TH	IE DESIGNATEÓ TSO FACILITY	:	•	
22 Designated TSD Facility Name 011 and Solvent Proce	ss Copany		EPA NO. LC A D O O	18 13 10 12 19 10 13
23	horized Agent and Title		Date Accepted	<u> </u>

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GENERATOR GENERAT	OR MOLETO	3 Designated To	PD 8	44	<i>:</i>		110111001	•	+10
	•	approved state	program or	federal program	o operate under n.)	4 Alternate TSD I		2 .	
2Name Rockwell Internat	onal		Solvent P	rocess Comp	ny		-BCIIIIY A Solvent December	0	•
EPA MC 0 D 0 7 18	3141314101	7	0,0,9,	8.0.5.	1 1 1 8	A. Name Chair	d Solvent Process	Company	
Address Rocky Flats Plans City, State, Zip Golden, CO	ione303-497-2377	Address 9131	E. 96th Ave	nue man	303) 289-4827		D 0 0 8	3 0 2	9,0
City, State, Zip GOTGER, CO	90401	City State 7th	Henderen	Colorado 8	840		W. 1st Street Pr	none (213) 3	334-5117
5 U.S. DOT PROPER SHIPPING NAME			<u> </u>	ii COIOTEGO SC	040 · 1·	City, State, Zip	Azusa, California	91702	
		HAZAND CLASS	187184	ONVERTIME	* PET UNITS	NUMBER OF CONTA	INCO.		
WASTE Compound, Paint Th	inning, Liquid	Combustible	NA1142		T				
WASTE	0001	Liquid	14122	Est.	Gallons	TYPE: W DRUMS	BAGS CART	TONS	
6 Waste Category 64					<u> </u>	I I OTHER			
O Waste Category D4	7 Ext. Hat.	Waste Permit No.22	A.NAI LA	والمقال الما	& Generalino P	rocetia Ciencina	paint equipm		
9 LIST COMPONENTS:	COMCENINATION	MANGE .							
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10 WASTE PROPERTIES: NA 7		· D n.	ALT WE PRINT	, Non-Ha	ardous Material	20-35 %			
10 WASTE PROPERTIES: pH 7 11 PHYSICAL STATE: Solid 10 Lig	IOXIC LI Flammable	□ Corrosive/irrita	ent 🗌 Res	clive Seni	itizer 🖸 Cercin	ogen/Mutenen			• •
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12 SPECIAL HANDLING INSTRUCTIONS	🖸 Gloves 🖸 Goggi	es - Respiratory	Other	Bungs + ligh	t. drume 18	eaking			
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GENERATOR CERTIFICATION: This is to co regulations of the Department of Transport	ation and EPA.	materials are properly	classified, des	cribed, packaged	marked, labeled, and	are in proper condition	n for transportation acc	ording to the	aphiloshio.
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TRANSPORTER							TOTTE Monage	16.4	
TRANSPORTER (HAULER MU	ST COMPLETE)	• •	*			. 15 PICK-UP DATE	_		
14 TRANSPORTER NAME OII and Solv	int Process Compan	y	•••	•				·š	-
ADDRESS 9131 E. 96th Avenue	PHONE (303)	289-4827		EPA NO.	CIPIDIO	1.810151.91	1 HALLEST	lmili 1	AM D PI
CITY, STATE, ZIP Henderson, Colo	redo 80640			18-7.2/	musi Min	Litera.	•	<u>:3-3</u>	-83 -83
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17 Name Oll and Solvent Process Co	mpany 44	6114					: ·	14	
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THORE NO. 1-30/ 200 402/						·		Continue	
20 INDICATE ANY SIGNIFICANT DISCRE	PANCIES BETWEEN M	ANIFEST AND SHIP	MENT:			-	Recycling	ade	
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22 Designated TSD Facility Name		Sandinied is	o radiulti	••			•••	D. M. KRIE	' A
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Flease, or print clearly. Press Hard.		WAS(ANIFE	ST	1 Mani Num		468
GENERATOR (GENERATOR MUST COMPLETE) 2Name Rockwell International	3 Designated Ti approved state Name Oil and	SD Facility (program or i Solvent Pro	Authorized to ederal program ocess Compa	operate under . h.) ny	Name Oil and Solve	int Process Comp	any
EPA PL C1 01 D1 01 71 81 31 41 31 41 (1 1 8		0 0 8 3 0	0 2 9 0
Address PO Box 464 Phone 303-497-23			Phone_(Address 1704 W. 1st	Phone Phone	213) 334-5117
City, State, Zip Golden, CO 80401	City, State, Zi	p Henderson	Colorado 60	540	City, State, Zip Azus	a, California 91702	2 .
5 U.S. DOT PROPER SHIPPING NAME	HAZARD CLASS	18 188°	ON AOCOME	UNITS	NUMBER OF CONTAINERS	4	•
WASTE FLANNABLE LIQUID, N.O.S.	FLAHMABLE	UN1993	200	gallons	TYPE: ORUMS () B		
WASTE DOOL	LIQUID		EST	<u> </u>	OTHER	L) DOMP THUCK	
6 Waste Category 66 7 Ext. H	laz, Waste Permit No_	NIL		6 Generating P	vocessEquipment_	Cleaning 5	
CONCENTRATION	OM BANGE	7'			• •	IATION RANGE	
9 LIST COMPONENTS: UPPER	LOWER	UNITS	LIST	COMPONENTS:	UPPER	LOWER	UNITS
A. Aliphatics 90	80	% Dpm	E		<u> </u>	· 	0 % 0
8 Ketones 6	$\frac{3}{2}$	% 🔲 ppm.	F			· • 	0 % 0
C		₩ 🔲 ppm.	G			. — 	0 % 0
D. Aromatics 10		% D ppm.	*******	zardous Materia	*	•	
10 WASTE PROPERTIES: pH			ictive [] Sen	sitizer 🔲 Gerck	nogen/Mutagen	ş	
11 PHYSICAL STATE: Solid Of Liquid Studge D	•		Drum	not leakin	e - bungs tight		
12 SPECIAL HANDLING INSTRUCTIONS: 2 Gloves 2 Go	eggies Respirator	N Oluer	DI VIII	HOL TEBRAI	P.	:	
GENERATOR CERTIFICATION: This is to certily that the above na	med materials are propert	y classified, des	cribed, packaged	, marked, labeled, ar	nd are in proper condition for tr	ensportation according	to the applicat
regulations of the Department of Transportation and EPA.				0 - In	Laes .	7 4	1-2-5
IN THE EVENT OF A SPILL, CONTACT THE		13 Signature o	Authorized Age	nt and TitleA			ate SMpped
RESPONSE CENTER, U.S. COAST BUARD 1-8	00-424-88UZ			Pelore	s M. Krieg, Traff	ic Hanager	
TRANSPORTER (HAULER MUST COMPLETE)					15 PICK-UP DATE	1-2-84	
14 TRANSPORTER NAME Oil and Solvent Process Com	Dany			`	10.10.10.10.10.10.10.10.10.10.10.10.10.1		11.
ADDRESS 9131 E. 96th Avenue PHONE	303) 289-4827		EPA NO	باقتمتهم		118 A TIMO	-73 D AM
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20 INDICATE ANY SIGNIFICANT DISCREPANCIES BETWEE	N MANIFEST AND SH	HPMENT:				Disposal	
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22 Designated TSD Facility Name	· · · · · · · · · · · · · · · · · · ·				EPA NO.	حل حلب المحالب	لمسلسل
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11 PHYSICAL STATE: Solid D Liquid D Studg	- General Broken	A PRINT TO LA	LA CHE MID OF	and distribute A
12 SPECIAL HANDLING INSTRUCTIONS: D GOOD	Coggles . G. Freight augus 11	State and other	अर्थ अनुध्या की	The state of the s
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22 Designated TSD Facility Name	A A B St. at a St. C. at a said	The main limit of the state of	A NO.	Decapted the sound of the
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EPA #10 10 10 17 18 13 14 13 14 10 1 Address PO Box 464 Phone 303-497-2377	Address 9131	E. 96th Aven	ue Phone_(Address 1704 W. 1st	Street Phone	213) 334-5117
City, State, Zip Golden, CO 80401	City, State, Zi			1040	City, State, Zip Azus	a, Calliornia 91702	<u> </u>
5 U.S. DOT PROPER SHIPPING NAME	HAZARDOTASS	RAS.	ON VOLUME	UNITS	NUMBER OF CONTAINERS	4	
WASTE FLAMMABLE LIQUID, N.O.S. WASTE DOOL	FLAMMABLE. LIQUID	UN1993	EST_	gallons	TYPE: 10 DRUMS 1 B	AGS CARTONS	
6 Waste Category 66 7 Ext. Haz	Waste Permit No	MA		8 Generating P	rocess Equipment C	leaning	
9 LIST COMPONENTS: CONCENTRATION UPPER	LOWER	UNITS	LIST	COMPONENTS:	CONCENTR UPPER	ATION RANGE LOWER	UNITS
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C. Alcohols 4		% □ ppm.	F			·	□ %· □ ppi
D. Aromatics 10		% [] ppm.	G	andria Atlanta	115 25	·	O % O ppi
		% : 🗆 ppm.		zardous Materia		7	
10 WASTE PROPERTIES: ph. 7 Toxic S Fiammabl					nogen/Mutagen		
11 PHYSICÀL STATE: Solid 12 Liquid Studge 5.8 12 SPECIAL HANDLING INSTRUCTIONS: 12 Glovés 12 Gogg				lesking	hunge tight		
							
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4 TRANSPORTER NAME OII and Solvent Process Compa			ERANO	46101971	Marsa Pi	11 8 1 4 1 - 1/	45
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20 INDICATE ANY SIGNIFICANT DISCREPANCIES BETWEEN I	MANIFEST AND SHI	PMENT:				Pacycling Disposal	
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	23 State Concession (22)			1,5,5
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Department of Health Services
Texts Substances Control Division
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·		Shipping Name, h	feterd Class, and ID Number	No.	Type	Total Quantity	Unit MANA	Waste No.
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ANALYTICAL REPORT

ROCKWELL INTERNATIONAL ENERGY SYSTEMS GROUP P.O. BOX 464 GOLDEN, COLORADO 80401

GENERAL LABORATORY BUILDING 881

DISTRIBUTION:

/L. R. Quintana 551

F. P. Vigil 881 P. A. Hyman 881

File

DATE:

M84-1112 5/17/84

ACCOUNT NO: 382-901577-02

APPROVED:

LAB NUMBER:

B. A. Medeiros

SAMPLE DESCRIPTION

Trichloroethylene Alk-Tri Confirm chemical composition and determine total alpha, so that barrel in warehouse can be properly disposed.

ANALYSIS RESULTS

Total Alpha (Radio Chemistry)

Sample was found to have a total alpha of 9.4×10^{1} pCi/L.

Composition (determined by infrared spectroscopy)

Trichloroethylene (solvent) (major)

The composition of this sample does not vary significantly from Dow IR Spectra of Gases and Vapor Grating Spectra Vol II #103.

IR File No. 8498

UNIFORM	orm designed for use on elle HAZARDOUS	1. Generator	US EPA 10 A		Manifest	2.Pege 1	inform	tion in the	shaded
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6. Transporter 1 011 6 Bolt 7. Transporter 2	vent Process Co Company Name	MARKY.	C-0-D-9	US EPA 10 Nu · B · O · S · O · US EPA 10 Nu	1-1-8-4	A. China			
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(EPA 8700-41)

DHS 8022 A (7/84) yellby copy: Transporter retains

pink copy: TSDF seeds to generator gold copy: Generator retains



PLANT SUPPORT LABORATORY

Date 8-8-80 Account No. R. L. Riegel

Lab. No. 580.679

226-952108-02 R. E. Leitner V. H. Matzick

Reported by

Approved

8.5.1111mx

Sample Description

J. L. Briggs M. J. Rea JFile.

Dapcost 1001 Chemical Process Coating, Aircraft Products Co., 1191 Hawk Circle, Anaheim, Ca. 92807. Identification and comparison to "Organoceram" as possible replacement.

Analysis Results

COMPOSITION

Solvent System:

toluene

methanol

short chain hydrocarbon (~C₇)

Resin System:

styrene-butadiene (major)

coumarone=indene (tackifier)(minor)

dydrated mineral magnesium silicate (filler)

CONCLUSION

This product differs from the previously used "organoceram" only in the organic solvent system. The resin system of the two coatings are quite similar. This coating appears to be an acceptible substitute for "organoceram".



Rockwell International

Rocky Fists Plant Energy Systems Group P.O. Box 464 Golden, Colorado 80401

REACTIVE CHEMICAL HAZARD DATA
REPORT NUMBER
DATE OF ISSUE 8-7-80
PREPARED BY J. A. ZALIKOWS I

MATERIAL NAME		Trends of The French ZP
DAPCOAT 100	. /	PHYSICAL STATE
SYNONYMS DAPCOAT	1 / Chamical Proces = Contino	Opage, green
		Viscous liquid
MANUFACTURER NAME AND ADDRESS	·	-
Aircraft trobats Co. 114	1 HANK CIRCL, ANAMEIM, LA. 92807	
STRUCTURAL FORMULA, COMPOSITION, COM	PONENTS, IMPURITIES	
Solvato: tolone		•
	hol (methonol)	
short Cha	in hydrocarbon	
Noun: Estadiene - et	itine	·
LOUMATORE - INd	ine	
	magnesionsiticate (filkr)	
LABORATORY SCREENING TESTS		
Differential Thermal Analysis		
		Drop-Weight Shock Sensitivity
امره		
	:	
Flammability Properties		-
Flash Point: 50 °C (*F)		
Fire Point: DZ *C (*F)		
Comments: Solvents are flux	mmable	
HAZARDOUS MATERIALS RATING (ROCKY FLA	TS PLANT HAZARDOUS MATERIALS MANUAL EN	(TAY)
(ISpecial Precautions, Warnings, Handling Instructions,	Comments)	•
_		
FLAMMABILITY - 3		•
REACTIVITY -		i
		į
Contains toluche, me	ethanol, short chain hydrocar	hom (possible hoters)
Stering - huterland		2.4.
	opposition result, commenter -	indent vesice, and
A militable minnedict	niugneoum silicate.	he solvents are
from made and proce	a Cangerous fue rick. S	olvento are
(Horic by ingrotion,	polyrier 125 in, Countrors. mugneouim silicate. a Congerous fire risk. S inhalation, and skin abs	orption.
ME OF ORIGINATOR OF MATERIAL		COUNT BUILDING EXTENSION
R.L. RIEGEL		69540802 444 4007
		Prompage () [I Log ()



Rockwell International

Atomics International Division Rocky Flats Plant P.O. Bes 464 Golden, Cetarade 80401

PLANT SUPPORT LABORATORY

Date 11/5/80

Lab. No. 58€.937

V. H. Matzick

319-901577-02

D. M. MELTON

M. J. Rca ∽File

To R. L. Riegel

Reported by

D. M. Melton

Approved

R. S. Cichor

Sample Description

Dapcoat #1001 Additive, 5 gallon can, Aircraft Product Co. P.O. CCP-19749-B, lot #0-294, RIRS #20990. Analyze and compare to 580.679.

Analysis Results

COMPOSITION:

Solvent system: toluene (major)

methanol (major)

Account No.

aromatic hydrocarbons (minor)
aliphatic hydrocarbons (minor)

Resin system:*

ø

coumarone-indene resin (tackificr) (major)

styrenc-butadiene resin (minor)

hydrated mineral magnesium silicate (filler) (major)

*Note: The respective amounts of coumarone-indene resin to the styrene-butadiene resin had been increased considerably. However, from a phone conversation (11/5/80) with R.L. Riegel, it was learned that this material is an additive package of Dapcoat #1001, for a 55-gallon-drum sample of Dapcoat #1001 which is lacking in the amount of tackifying agent (coumarone-indene resin). Therefore, this compositional change should not affect the requirements of Dapcoat #1001 due to the nature of its use.



Rockwell International

Energy Systems Group Rocky Flets Plent P.O. Box 464 Golden, Celorado 80401

To J. Hayden 374

Account No.

1:5-900814

Date 8-14-81

Lab. No.

M81-1458

R.F. Hessick 551

D.F. Hornbacher 123

L. DiGiallenardo 123

File

Reported by

Approved

Johnson

Sample Description

Dapcoat 1001 Composite Samples

Analysis Results

Total Alpha(dm1)

Be mg/g

444 Bldg.

320 ± 312

< . 1

Warehouse

103 - 268

< .1

Energy Systems Group Recty Fiess Plant P.O. Box 464 Golden, Colorado 80401

. Hayden

Account No. 339

Date 9/14/8Z

Lab. No. M82-1691

ile cc: P.A. Hyman

Reported by

/ Hyman

Approved

D.I. Hunter

ample Description

Liquid waste samples: 26 suspected carbon tetrachloride waste solvents for identification; 3 trichloroethane solvents for gamma scan; two oil samples for gamma scan.

nalysis Results

INFRARED SPECTROSCOPY

All 26 samples were examined by vapor and liquid phase infrared spectroscopy in order to characterize the major liquid constituents. No attempt was made to identify any solids (dissolved or not), nor any trace level impurities. When a sample exhibited two distinct immiscible layers, an aliquot from each layer was analyzed. Results are summarized in the following table:

Sample No.	Physical Description	Composition
1a	single layer; clear yellow-orange liquid; fine undissolved rust- colored solids	water (major) carbon tetrachloride, 1,1,1-trichloro- ethane, and chloroform, all in frace amounts
2	single layer; clear colorless liquid; fine undissolved rust- colored solids	water (major) no trace solvents detected
3	2 layers; top layer is opaque light brown; bottom layer is clear, yellow liquid with some undissolved solids	top layer: water (approximately 2 ml) bottom layer: carbon tetrachloride (approximately 110 ml)
4	2 layers: top is cloudy yellow-orange liquid; bottom is cloudy brown liquid with undissolved solids.	top layer: water (major) (approx. 70 ml) bottom layer: carbon tetrachloride (major) chloroform (minor) unidentified oils and surfactants (minor) (approx. 30 ml)

` C	Co-mlo	Physical	
	Sample	Physical	Compasition
	No.	Description	Composition
)	5 b	2 layers: top is clear yellow liquid; bottom	top layer: water (approx. 20 ml) bottom layer: carbon tetrachloride
		is clear yellow liquid; fine undissolved solids at liquid/liquid boundary	umidentified oils and surfactants (approx. 80 ml) Carbon dioxide and carbon monoxide gases were also detected in the vapor phase of
			the sample.
·	6a,b	single layer; clear light orange liquid; fine rust-colored undissolved solids.	<pre>water (major) carbon tetrachloride, chloroform, 1,1,1-trichloroethane, perchloroethylene and carbon dioxide all detected in trace amounts in the vapor phase.</pre>
	7	single layer; clear colorless liquid; trace of undissolved solids	water (major) no carbon tetrachloride detected
•	ga,b	single layer; clear light yellow liquid; trace of fine, rust-colored undissolved solids	water (amjor) carbon tetrachloride, chloroform, l,l,l-trichloroethane, perchloroethylene, and OO2 all detected in trace amounts in vapor phase.
<u>)</u>	9 a	single layer; clear colorless liquid; trace undissolved solids	water (major) trace only carbon tetrachloride
	10a,b	single layer; clear light orange liquid; fine, rust-colored undissolved solids	water (major) carbon tetrachloride, chloroform, perchloroethylene, and carbon dioxide all detected in trace amounts in vapor phase
	11	2 layers: top layer is clear yellow liquid; bottom layer is clear amber liquid; contains variety of undissolved solids	top layer: water (approx. 70 ml) bottom layer: carbon tetrachloride chloroform unidentified oils and surfactants (approx. 30 ml total)
	12 ^b	2 layers: top is clear liquid; bottom is clear brown liquid, contains a variety of undissolved solids	top layer: water (approx. 110 ml) bottom layer: carbon tetrachloride
(13b,c	2 layers: top is opaque brown liquid; bottom is clear, colorless liquid;	top layer: paraffinic base mineral oil trace carbon tetrachloride and chloroform
<u>)</u>	;; ;;	contains variety of undissolved solids	(approx. 10 ml total) bottom layer: water (aprox. 100 ml) Carbon dioxide was also detected in the vapor phase.

		·	
C	,		
•	Sample No.	Physical Description	Composition
٠.			
	14	single layer; clear colorless liquid; trace undissolved solids	carbon tetrachloride (major) paraffinic base mineral oil (minor) trace moisture on walls of bottle and surface of solvent
	<u>15</u> a,b	single layer; cloudy, colorless liquid; trace undissolved solids	water (major) carbon tetrachloride and \mathfrak{O}_2 detected in trace amounts in vapor phase
	16 ^a ,b	single layer; clear colorless liquid; trace undissolved solids	water (major) carbon tetrachloride and CO ₂ detected in trace amounts in vapor phase
. (17a,b	single layer; clear yellow liquid; fine undissolved solids	water (major) carbon tetrachloride, chloroform, \mathcal{O}_2 , and carbon monoxide detected in trace amounts in vapor phase
	18 ^{a,b}	single layer; clear colorless liquid; fine undissolved solids	water (major) carbon tetrachloride and ∞2 detected in trace amounts in vapor phase
•	19ª,b	single layer; clear yellow liquid; fine undissolved solids	water (major) carbon tetrachloride, \mathcal{O}_2 , and carbon monoxide detected in trace amounts in vapor phase
	20	single layer; clear light green liquid	water (major) no solvents detected by ir
	21 a ,b	single layer; clear yellow liquid; undissolved solids	water (major) carbon tetrachloride, chloroform, 1,1,1-trichloroethane, perchloroethylene, OO2, and carbon monoxide all detected in trace amounts in vapor phase
	22 b ,c	two layers: top is opaque light brown; bottom is clear, colorless liquid; fine undissolved solids in both layers	top layer: paraffinic base mineral oil (major) carbon tetrachloride (minor) chloroform (minor) (approx. ½ ml total) bottom layer: water (approx. 110 ml total) CCl4, O2, and chloroform all detected in vapor phase

23b 2 layers: top layer is opaque brown; bottom is clear, light brown liquid; some undissolved solids

top layer: water

(approx. 15 ml)

bottom layer: 'carbon tetrachloride (major)

'paraffinic base oil (minor)

'chloroform (minor)

vapor phase

24^a,b single layer; clear yellow liquid; fine undissolved solids

water (major carbon tetrachloride, perchloroethylene, chloroform, CO₂, and carbon monoxide all detected in trace amounts in vapor phase

25^{a,b} single layer; clear colorless liquid; fine undissolved solids

water (major) carbon tetrachloride and O_2 detected in trace amounts in vapor phase

26 2 layers: top is clear, colorless liquid; bottom is clear, colorless liquid

NOTES:

1

- a. Carbon tetrachloride, chloroform, perchloroethylene, and 1,1,1-trichloroethane are all insoluble in water. When mixed with water these chlorinated solvents will form a separate layer immiscible with water. In the 2-layer systems the chlorinated solvents will occupy the bottom layer as they are all denser than water. Although essentially insoluble, depending upon the pH of the water and the presence of surfactants, these chlorinated solvents can dissolve in water to the extent of a few hundred ppm. This slight solubility accounts for their detection in the essentially aqueous samples analyzed.
- b. In several of the samples submitted, carbon dioxide and carbon monoxide were detected in the vapor phase. This is indicative of organic decomposition reactions as well as of microorganism activity.
- C. Two samples were identified as a combination of an oil layer and a water layer. In these cases, carbon tetrachloride was detected dissolved in the oil layer.

IR File No. 7765

The following samples are essentially water only (no significant carbon tetrachloride detected): (12)6(18)9(0)17,60(17)(8)9(0)(1)24)and(25)

Samples nos. 13 and 22 are two layer systems containing essentially water and oil.

The remaining samples contain significant measurable amounts of carbon tetrachloride.

'n

Rockweil International

To J. Hayden

Account No.

Date 9/15/82 Lab. No.

Waste Operations

Bldg. 374

Reported by

R. C. Young

Approved

Sample Description

Carbon test composite Sample date, 8/1/82 Results in pCi/ml

Analysis Results

SAMPLE I.D.

VOL./WT.

COUNT TIME

D23905

3 ml

79458 sec.

TH-232 DECAY DAUGHTER

BI-212

1.0E0±1.6E-1

Pb-212

1.1E0±1.6E-1

TH-228

1.0E0±1.6E-1

SEPROBLE COMPRESS 473

ANALYTICAL REPORT

ROCKWELL INTERNATIONAL ENERGY SYSTEMS GROUP P.O. BOX 464 GOLDEN, COLORADO 80401

GENERAL LABORATORY BUILDING 881

DISTRIBUTION:

VJ. A. Hayden, Waste Oper 374
D. D. Hornbacker, Env & Occ Health
File

LAB NUMBER: M85-0822 DATE: 5-17-85 ACCOUNT NO: 389

ANALYSIS BY: R. M. Leitner and

B. A. Medeiros

APPROVED: B. A. Medelios

SAMPLE DESCRIPTION

Twenty-eight waste matrial found outside of S & W Warehouse and PU & D yard. Identify waste material, determine PCB content, flash point and presence of any chlorinated solvents.

ANALYSIS RESULTS

Infrared Spectroscopy

Sample ID	Components	
PU & D C-1 (# 15)	 Oil * A volatile hydrocarbon solvent (e.g., mineral spirits: aliphatic naphtha) carbon dioxide (minor) water (major) (bottom layer) pH=9 	
PU & D C-2 (# 21)	- oil * - carbon dioxide (minor) - methyl alcohol (minor)	
PU & D C-3 (# 27)	- oil * - carbon dioxide (minor)	
PU & D C-4 (# 8)	<pre>- oil * - silicone lubricant (minor) - water (major) (bottom layer) pH=6</pre>	
PU & D C-5 (# 14)	- oil * - silicone lubricant (minor) - carbon dioxide (minor)	
PU & D C-6 (# 6)	- oil * - carbon dioxide (minor) - Freon (minor) - water (major) (bottom layer) pH=7	

page 1 of 4

Date: 5-17-85

ومرجوب المساوات والمراج المراجع والمساوات والمساوات والمساوات والمساوات والمساوات	
Sample ID	Components
PU & D C-7 (# 12)	- oil e - silicone lubricant (minor) - carbon dioxide (minor)
•	- water (major) (bottom layer) pH=7
PU & D C-8 (# 5)	- oil * - silicone lubricant (minor) - carbon dioxide (major) - methyl alcohol (minor) - xylenes (minor) - water (major) (bottom layer) pH=6
PU & D C-9 (# 11)	- oil = - Freon TF (major) - carbon dioxide (minor) - water (major) (bottom layer) pH=7
PU & D C-10 (# 17)	- oil • - silicone lubricant (minor) - carbon dioxide (minor) - water (major (bottom layer) pH=6
PU & D C-11 (#23)	- oil * - Freon TF (major) - carbon dioxide (minor) - water (major (bottom layer) pH=7
PU & D C-12 (# 1)	- silcone lubricant (major) - oil * - carbon dioxide - Freon TF (minor) - water (major) (bottom layer) pH=7
2x (# 20)	- oil *
3 (# 26)	- water (major) pH=8 - xylenes (minor)
	possibly styrene/butadiene coplymer (minor)possibly polyethylene gylcol (major)
7 (# 13)	- oil * - Freon TF (major) - xylenes (major)

page 2 of 4

M85-0822

Date: 5-17-85

Sample ID	Components		
11 (# 7)	- oil * - carbon dioxide (minor) - water (major) (bottom layer) pH=7		
37 (# 18)	- oil * - Freon TF (major) - 1,1,1 - trichloroethane (major) - water (major) (top layer) pH=3		
41 (# 19)	- oil • - carbon dioxide		
67 (#24)	- oil • - carbon dioxide (minor)		
98 (# 25)	- water (major) pH=4 - carbon dioxide (minor) - 1,1,1 - trichloroethane (minor)		
85091.1 -> 85091.4 (# 4)	- scetone (major) - carbon tetrachloride (minor)		
85092.1> 85092.5 (# 2)	- ethanol (major) - scetone (major) - carbon tetrachloride (minor) - oil * (very minor)		
85056.1> 85056.2> 85002 (#3)	- oil * - Freon TF (major)		
S & W oil -5- (# 9)	- oil **		
S & W Texaco oil (# 22)	- oil **		
S & W Brake fluid (# 28)	- glycol ether/borate base brake fluid		
Texaco Meropa & Thurban (# 10)	- oil •		
Zep Dyna-Sol -2- (# 16)	- oil * - xylenes (major) - Freon TF (minor)		
** Oil (e.g., mix of paraffinic and naphthinic base mineral oil) * Oil (e.g., paraffinic base mineral oil.			

page 3 of 4

Date: 5-17-85

All the PU & D samples except PU & D C-4, contain a significant amount of carbon dioxide.

IR FILE # 8859

Emission Spectroscopy

NOTE: The numbers in the parentheses are those numbers used in the emission spectrographic results.

Flash points were determined by Pensky-Martens closed tester ASTM method D93-73. Results are recorded in OC. PCB results are also reported below. For the PCB analysis samples were diluted with became and run on the Gas Chromatograph. PCB results are reported in parts per million total PCB's.

Sample	Flash Point (°C)	PCB (ppm)
PU&D C-1	24.0	<6.22
PU&D C-2	27.0	<6.00
PU&D C-3	24.0	<6.23
PU&D C-4	29.0	<6.04
PULD C-5	24.0	<6.02
PU&D C-6	38.0	<50
PU&D C-7	21.0	<6.20
PU&D C-8	17.0°	<6.22
PU&D C-9	19.0	<6.03
PU&D C-10	21.0	<6.08
PU&D C-11	<75.0	<6.10
PU&D C-12	26.0	<6.18
2X	53.0	<6.14
3 7	43.0	<6.36
	25.0	<6.38
11	37.0	<34.48
37	<11.0	<5.75
41	>75.0	<6.09
67	35.0	<37.0
98	21.0	<6.17
85091.1> 85091.4	-9.4°C(based or	acetone)<6.04
85092.1 -> 85092.5	12.7°C	<5.78
85056.1>85056.2>85002	not flammable	<4.98
S & W oil -5-	65.0	<6.15
S & W Texaco oil	58.0	<6.03
S & W. Brake fluid	73-0	<6.14
Texaco Meropa & Thurban	>75.0	<50.0
Zep Dyna-sol -2-	39.0	<6.34

IR FILE # 8859

Lab. Number: <u>M85-0822</u>

			SAMPLE	EID		
ELEMENT	1	2	3	4	5	6
Al	10	<1.0	<1.0	<1.0	35	10
B	28	<5.8	₹5.0	₹5.6	60	₹5.8
Be	<.10	<.10	<.18	₹.10	<.10	<.10
Ca	98	<1.0	<1.6	<1.0	250	85
Cd	⟨5.8	<5.0	₹5.0	<5.0	(5.8	(5.0
Co	<10	<10	<10	<10	<10	<10
Cr	1.0	<1.8	<1.0	<1.8	<1.0	3.0
Cu	3.0	<1.8	<1.0	<1.0	2.0	3.0
Fe	60	<10	<18	<10	125	35
K	15	<10	<10	<10	20	25
Li	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0
Mg	9.8	<1.8	<1.0	<1.0	23	23
Mn	<10	<10	<18	<10	<10	<10
Mo	<10	<10	<10	<10	<10	<10
Na	60	<16	<16	<16	40	50
Ni	1.0	<1.0	<1.0	<1.0	<1.0	4.8
Pb	1.0	<1.0	<1.0	<1.0	7.8	4.0
Si	128	1.0	<1.0	1.0	130	18
Sn	<10	<10	<10	<18	<18	<10
V	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0
Zn	25	<10	<10	<18	15	10

			SAMPL	EID		
ELEMENT	7	В	9	10	11	12
Al	3.6	60	2.0	<1.0	3.6	68
B	<5.8	60	₹5.0	₹5.0	15	30
Be	<.18	<.10	<.10	<.10	<.10	.18
Ca	60	400	288	4.0	78	500
Cd	<5.8	₹5.0	(5.8	(5.8	<5.0	₹5.0
Co	<10	<18	<10	<10	<10	<18
Cr	1.0	2.0	<1.8	<1.0	2.0	4.8
Cu	<1.8	6.8	<1.0	<1.8	1.0	18
Fe	20	100	<10	<18	25	170
K	50	10	<10	<10	60	<10
Li	<1.0	<1.0	<1.0	<1.8	3.0	<1.6
Mo	20	70	<1.0	<1.0	15	40
Mn	<10	<10	<10	<10	<10	<10
Мо	<16	<10	<10	<10	<10	<10
Na	78	50	<16	<16	80	16
Ni	<1.0	<1.0	<1.0	<1.0	<1.0	2.8
Pb	1.9	35	25	<1.0	2.0	50
S i	6.0	130	2.0	2.0	11	130
Sn	<10	<10	<10	<10	<10	<18
Y	<1.8	<1.0	<1.0	<1.0	<1.0	⟨1.0
Zn	<10	125	50	<10	<10	120

Lab. Number: <u>M85-0822</u>

	SAMPLE	ID
ELEMENT	13	14
R1	<1.0	18
3	<5.0	110
De '	. 10	<.10
Ca	3.6	500
Cd	<5.6	<5.0
Co	<10	<10
Cr	<1.0	3.6
Cu	<1.8	8.0
Fe	<10	100
K	<10	<10
Li	<1.8	<1.0
Ng	1.8	100
Ħn	<18	<18
Mo	<10	<10
Na	<16	45
Ní	<1.0	<1.0
Pb	<1.8	80
Si	7.0	45
\$n	<18	<1.0
V	<1.8	<1.0
Zn	<10	180

These results were determined by semiquantitative emmission spectroscopy; relative error is expected to be fifty percent.

Ril results are reported in <u>Fgrams/ml</u> Plate No. 2982

Lab. Number: <u>M85-822</u>

			SAMPL	EID		
ELEMENT	15	16	17	18	19	
Al	25	₹1.0	. 180	25		20
B	150	⟨5.0	25	5.0	2.0	4.0
Be	<.10	<.10	.50		₹5.0	10
Ca	>500	2.0	225	<.10	<.10	<.10
Cd	₹5.0	₹5.0	₹5.0	45	3.0	25
Co	<18	<10		<5.0	⟨5.0	₹5.0
Cr	4.8	₹1.0	<18	<10	<10	<10
Cu	18	<1.0	6.0	5.0	<1.0	<1.0
Fe	100	<10	20	23	<1.0	23
K	10		200	>500	<10	23
Li	<1.0	<10	25	<10	<10	10
Mo	78	<1.8	<1.8	1.0	<1.0	<1.0
in		<1.0	45	7.0	1.0	4.0
10	<10	<10	<10	<10	<10	<10
i a	<10	<10	<10	<10	<18	₹18
li	78	<16	60	36	<16	60
	<1.0	<1.0	3.0	10	<1.0	
Ъ	130	<1.0	160	4.8	<1.0	<1.0
3 i	45	3.0	300	80	9.0	3.0
n	<10	<18	<10	<10	<10	13
	<1.8	<1.0	<1.0	<1.0		<10
n	215	<10	138	15	<1.0 <10	70

e. ====	<u></u>		SAMPL	EID		
ELEMENT	21	22	23	24	25	7 24
Al	20	3.0	110	3.0		26
<u> </u>	125	₹5.0	13	₹5.0	(1.8	3.8
Be-	<.18	<.10	<.10	(.10	(5.6	>5000
Ca	>500	2.8	250		<.10	<.10
Cd	<5.0	₹5.0	₹5.0	35	2.0	13
Co	<10	<10		₹5.0	<5.0	<5.0
Cr	3.0	<1.0	<10	<10	<10	<10
Cu	9.0		7.0	<1.8	<1.0	<1.0
Fe	65	<1.0	20	<1.0	<1.0	<1.0
K	45	<10	225	30	>5000	15
Li		<10	25	45	<10	28
Mo	<1.0	<1.0	<1.0	<1.8	<1.0	<1.0
in in	90	<1.0	40	8.6	<1.0	
	<10	<10	<10	<10	300	2.6
10	15	<10	<18	<10		<10
Va.	88	<16	68	80	13	<10
11	<1.0	<1.0	2.0		<16	>820
b	70	<1.0	200	<1.0	7.0	<1.0
i	18	3.0	250	3.0	3.0	<1.0
n	<18	<10		12	2.0	10
	<1.0		<10	<10	<10	<10
n	175	<1.8	<1.8	<1.8	<1.0	₹1.0
	410	<10	130	<18	<10	<18

Lab. Number: <u>M85-822</u>

	SAMPLE	<u> 1 D</u>
ELEMENT	27	28
Al	18	2.8
3	80	566
Be	<.10	. 20
Ca	>500	4.0
Cd	<5.0	<5.0
Co	<18	<18
Cr	3.0	<1.0
Cu	7.0	<1.0
Fe	60	<10
K	35	<18
Li	<1.0	<1.0
Mg	100	<1.0
Mn	<10	(18
Mo	<10	<10
Na	55	160
Ní	<1.0	<1.0
Pb	110	15
Si	20	3.0
5n	<10	<10
٧	<1.8	<1.0
Zn	175	<10

Internal Letter



Date April 9, 1985

TO (Name, Organization, Internal Address)

J. A. Hayden

·Waste Operations

·Bldg. 374

No.

FROM

R. C. Young Rad. Measurements

Bldg. 123 7425

SUBJECT .

Results of gamma scan of waste oil samples dated 3/22/85 in pCi/l.

Sample	Radionuclides
SGS OIL 1 2 3 4 5 6 7 8	less than background Bi212 - 49.0
· 3	less than background
4	less than background
5	Pb212 - 28.3
6	Pb212 - 20.4, Th234 - 30.7
ž	less than background
8	Pb212 - 16.4
9	less than background
10	Pb212 - 2.9
11	less than background
12	Pb212 - 6.5
13	Th234 - 4560
14	less than background
15	Pb212 - 26.4
16	less than background
17	less than background
18	Bi212 - 39.1, Pb212 - 40.5
19	Pb212 - 51.4
. 20	Bi212 - 49.6
21	Pb212 - 43.2
22	Th234 - 547
23	less than background
24	less than background
25	Pb212 - 14.4
26	less than background
27	Pb212 - 12.2
28	Pb212 - 18.5

R. C. Young Radiation Measurements

NAME _	Rockwell In	iternational - Roc	ky Flats Plant
EPA PERI	MIT NO		
PICK UP	ADDRESSRO	ocky Flats, CO	STREET CIT
51101151	497~7000	2 20 NG)
	•		_DATE
TYPE OF	PROCESS	Machining Ope	
		ust be filled in by pro	
DS OIF	., gals. 1340	TANK B	OTTOM SEDIMENT, gals.
		□ SOLVEN	
and corre	BCI. Brace	a-meinen	1 100mm
Transport	Delores	M. Krieg, Traffic SIGNATURE OF AUTHORIZE	Manager
Transport	Delores lator, Storer and Approved Drai EPA Permit No	M. Krieg. Traffic SIGNATURE OF AUTHORIZE I Treator of Waste in Oil Service/Milt Ad o. COD-080827282 Avenue, Commerce C	Manager DAGENT AND TITLE ams, Inc.
NAME	Delores lator, Storer and Approved Drai EPA Permit No. 5390 E. 72nd	M. Krieg, Traffic SIGNATURE OF AUTHORIZE I Treator of Waste in Oil Service/Milt Ad o. COD-060827262 Avenue, Commerce C	Manager DAGENT AND TITLE ams, Inc.
NAME PICKUP I VEHICLE	De lores later, Storer and Approved Drai EPA Permit No. 5390 E. 72nd A Phone 303/287 DATE	M. Krieg, Traffic SIGNATURE OF AUTHORIZE I Treator of Waste in Oil Service/Milt Ad o. COD-060827262 Avenue, Commerce C 7-2807	Manager DAGENT AND TITLE ams, Inc. Sity, CO 80022
NAME PICKUP I VEHICLE	De lores later, Storer and Approved Drai EPA Permit No 5390 E. 72nd A Phone 303/287	M. Krieg, Traffic SIGNATURE OF AUTHORIZE I Treator of Waste in Oil Service/Milt Ad o. COD-060827262 Avenue, Commerce C 7-2807	Manager DAGENT AND TITLE ams, Inc. Sity, CO 80022
PICKUP (VEHICLE	De lores lator, Storer and Approved Drai EPA Permit No. 5390 E. 72nd / Phone 303/287 OATE	M. Krieg, Traffic SIGNATURE OF AUTHORIZE I Treator of Waste in Oil Service/Milt Ad o. COD-060827262 Avenue, Commerce C 7-2807	ams, Inc. Sity, CO 80022 TIMEtom Sed \$
PICKUP (VEHICLE DOIL O DOIL THE DES above, an	De lores later, Storer and Approved Drai EPA Permit Ni 5390 E. 72nd / Phone 303/287 DATE	M. Krieg, Traffic SIGNATURE OF AUTHORIZE Treator of Waste in Oil Service/Milt Ad o. COD-060827282 Avenue, Commerce Cr-2807 D/B2 Tank Bot Other was handled by me, I.	ams, Inc. ity, CO 80022 TIME12:00 p.m. tom Sed\$ the treatment facility named that the foregoing is true and M Buckly

h'.

• •



Rockwell International

Energy Systems Group

To J. Hayden

Account No.

Date 9/9/82

Lab. No.

Reported by R. C. Young

Approved

Sample Description

Sample collected on 7/1/82

Reported in pCi/g

Analysis Results

SAMPLE I.D.

NAME

WT., VOL.

COUNT TIME

D21605

Waste Oil 28

2cc

58438 sec.

U-238 DECAY DAUGHTER

RA-226

8.7E-1±4.3E-1

TH-232 DECAY DAUGHTER

BI-212

1.7E0±2.8E-1

PB-212

1.8E0±2.9E-1

1.7E0±2.8E-1

TH-228



To John Hayden

Account No.

Date

9/9/82

Lab. No.

Sant, Callin

Reported by

Approved

Sample Description

Sample collected on 7/1/82

Reported in pCi/g

Analysis Results

SAMPLE I.D.

NAME

WT, VOL.

COUNT TIME

D21407

Waste Oil #18

2cc

227111 sec.

"-238 DECAY DAUGHTER

1-214

1.0E0±2.3E-1

1-226

1.1E0±2.3E-1

TH-232 DECAY DAUGHTER

BI-212

2.1E0±2.1E-1

PB-212

2.2E0±2.2E-1

TH-228

2.1E0±2.1E-1



E.P.A. MANIFEST RECORD

Generator Of Waste (Must be filled in by producer) Nº 15343
NAME ADDRIGOT International - ROCKY Flats Plant
EPA PERMIT NO.
PICK UP ADDRESS MOCKY FINTS, CO
NUMBER STREET CITY
PHONE NO. 4×7-7030 P.O. NO.
ORDER PLACED BYDATE
TYPE OF PROCESS Machining Operations WHICH PRODUCED WASTES and Garage CODE NO.
Description Of Waste (Must be filled in by producer)
OIL, gais.
□ OTHER, gais. □ SOLVENT, gais.
This waste is described to the best of my ability and it was delivered to a licensed Liquid Waste hauler. There are no PCB in this product. I certify (or declare) under penalty of perjury that the foregoing is true and correct. Delores AL MITTORIED AGENT AND TITLE BIGHATURE OF AUTHORIZED AGENT AND TITLE
Transportator, Storer and Treator of Waste
NAME Approved Drain Oil Service/Milt Adams, Inc. EPA Permit No. COD-060627262 5390 E. 72nd Avenue, Commerce City, CO 80022 Phone 303/287-2807
PICKUP DATE 10/19/62 TIME 3:00 p.m.
VEHICLE UNIT NO. 96
反Oll Gals\$ □ Tank Bottom Sed \$
☐ Solvent Gals\$ ☐ Other\$
THE DESCRIBED WASTE was handled by me, the treatment facility named above, and was accepted. I certify (or declare) under penalty of perjury that the foregoing is true and correct.
BIGINATURE OF AUTHORIZED AGENT
WHITE-Office CANARY-Billing PINK-Acknowledgement GOLD-Generator's Copy



Rocky Flots Plant P.O. Box 464 Getten, Colorado 80401

To John Hayden

Account No.

· · · · · ·

979782 Date

Lab. No.

Reported by

R. C. Young

Approved

Sample Description

Sample collected on 7/1/82

Reported in pCi/g

Analysis Results

SAMPLE I.D.

NAME

WT., VOL.

COUNT TIME

D20707

Waste 0il #2

2cc

025621

U-238 DECAY DAUGHTER

PB-214

1.1E0±1.9E-1

RA-226

1.0E0±2.3E-1

TH-232 DECAY DAUGHTER

BI-212

1.9E0±2.0E-1

PB-212

2.0E0±2.1E-1

TH-228

1.9E0±2.0E-1

57230 sec.



Rockwell International

Energy Systems Group Rocky Flats Plant P.O. Box 464 Gelden, Colorado 80401

To John Hayden Account No. 979782 Date Lab. No. Reported by R. C. Young Approved Sample Description Sample collected on 7/1/82 Reported in pCi/g Analysis Results SAMPLE I.D. NAME WT., VOL. COUNT TIME D20906 Waste 011 #2A 2.0cc

238 DECAY DAUGHTER

PB-214 7.6E-1±3.3E-1 RA-226 1.2E+0±4.7E-1

TH-232 DECAY DAUGHTER

BI-212 1.5E+0±2.5E-1 PB-212 1.5E+0±2.5E-1 TH-228 1.4E+0±2.5E-1

EASTMAN KODAK COMPANY APPROVED BY U.S. DEPARTMENT OF LABOR "ESSENTIALLY SIMILAR" TO FORM OSHA-20

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Clinda	۹
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MSDS-6106-1 (7-80)

CHEMICAL NAME: Diocityl Phthalai FORMULA: C4H4(COOCH24 MANUFACTURER: Marketed by Eas ADDRESS: Kingsport, Tenne FOR INFORMATION ON HEALTH HAZARD FOR OTHER INFORMATION CALL: Extens		SECTION				L-4-84
CHEMICAL NAME: Diociyl Plathalai FORMULA: C4H4(COOCH2C MANUFACTURER: Marketed by Ease ADDRESS: Kingsport, Tenno FOR INFORMATION ON HEALTH HAZARD FOR OTHER INFORMATION CALL: Extens SECTION 1 FRINCIPAL HAZARDOUS COMPONENT (S)				SIZE: N	ot sooi	
FORMULA: C4H4(COOCH26 MANUFACTURER: Marketed by East ADDRESS: Kingsport, Tenno FOR INFORMATION ON HEALTH HAZARD FOR OTHER INFORMATION CALL: Sank is SECTION 1 PRINCIPAL HAZARDOUS COMPONENT (S)	e (Bis(2-eth)	ylhexyl) Phthalate] 402			or app	icable.
MANUFACTURER: Marketed by East ADDRESS: Kingsport, Tennote OR INFORMATION ON HEALTH HAZARD Same in Section 1 SECTION 1 PRINCIPAL HAZARDOUS COMPONENT (S)		1 7 7 7	8	CAS No.	117-81	-7
COR INFORMATION ON HEALTH HAZARD OR OTHER INFORMATION CALL: Extens SECTION 1 PRINCIPAL HAZARDOUS COMPONENT (S)	CH[C3H3]C	.°H*)³				
OR INFORMATION ON HEALTH HAZARD OR OTHER INFORMATION CALL: Extens SECTION I PRINCIPAL HAZARDOUS COMPONENT (S)	iman Chemi	ical Products, Inc.	•			
Sanie is Section of Call: Extension Call: Extension Section is Section in Call	essee 37662	2				
SECTION I PRINCIPAL HAZARDOUS COMPONENT (S)	S CALL: al	londay thru Friday, 8 a.m5 p 1 other times (615) 247-04)],	.m. (Easte Ext. 4666	m), (615) :	47-04	11, Ext. 3613;
PRINCIPAL HAZARDOUS COMPONENT (S)	number as at sion 2978	INFORMATION EF	FECTIVE	AS OF:	Janua	ŋ, 1980
	HAZAR	DOUS INGREDIENTS OF	MIXTU	RES		
Not applicable.	` .			%		TLV (Units)
			1			
· · · · · · · · · · · · · · · · · · ·	 					·
						
	· · · · · · · · · · · · · · · · · · ·					
			<u> </u>			
	SECTIO	N III PHYSICAL DATA				
OILING POINT (°F.) 724°F (384°C)	SPECIFIC GRAVITY	H ₂ O = 1)	0.985	@ 20°	/20°C
APOR PRESSURE (mm Hg.) 1.2 € 20	00°C	PERCENT VOLATILE BY VOLUME (%)		Not a	pplicat	ole.
APOR DENSITY (AIR = 1) 13.5		EVAPORATION RATE	_	Not a	pplicat	ole.
OLUBILITY IN WATER Negligib	le.					
PPEARANCE AND ODOR Clear liq	uid, little or	no odor.				
SECTION	IV FIRE	AND EXPLOSION HAZ	ARD DA	TA I		
LASH POINT (Method used) 420°F (216	s*C) COC	FLAMMABLE LIMITS		(e) 0.28		Vel Not determi
XTINGUISHING MEDIA Dry Che	mical, Water	r Spray, Carbon Dioxide	,	e 474°F ()
		• •				
INUSUAL FIRE AND XPLOSION HAZARDS None kn	f-contained l	breathing apparatus and prote with skin or eyes.	ctive cloth	ing		



SECTION V. HEALTH HAZARD DATA

IRESHOLD LIMIT VALUE

5 mg/m³ (A.C.G.I.H., 1979)

EFFECTS OF OVEREXPOSURE

None expected.

EMERGENCY AND FIRST AID PROCEDURES

OTHER PRECAUTIONS

None should be needed.

		VI REACTIVITY DA	
STABILITY	UNSTABLE	CONDITIONS TO AVO	OID applicable.
_ _	STABLE X		
NCOMPÄTIBILITY Materials to avoi	,,	n cause a vigorous reaction.	· <u>·</u>
IAZARDOUS DECOMPOSITION		rganic material, combustion probably carbon monoxide	n will produce t.
AZARDOUS PO	YMERIZATION CONDITIONS TO	AVOID	
Agy Occur V	ill Not Occur Not applicable	t.	
	SECTION VII	SPILL OR LEAK PRO	CEDURES
STEPS TO BE TAI CASE MATERIA LEASED OR SP	L IS Eliminate ignition sour	ces. Flush spill away with lected with absorbent mate	- · · · · · · · · · · · · · · · · · · ·
WASTE DISPOSA	METHOD		·
	Incineration		
	Incineration. Observe all Federal, sta	ite, and local laws concerns	ing health and environment.
	***************************************	ite, and local laws concerni	ng health and environment.
	Observe all Federal, sta	cial PROTECTION I	
_	Observe all Federal, sta	CIAL PROTECTION I	
of ecify type!	Observe all Federal, sta SECTION VIII SPE DIECTION An appropriate NIOSH if needed.	CIAL PROTECTION I	NFORMATION ists and/or organic vapor should be worn
Specify typel	Observe all Federal, sta SECTION VIII SPE DIECTION An appropriate NIOSH if needed. LOCAL EXHAUST If needed to contemporatures.	CIAL PROTECTION II	NFORMATION
ENTILATION	Observe all Federal, sta SECTION VIII SPE DIECTION An appropriate NIOSH if needed. LOCAL EXHAUST If needed to con- temperatures. MECHANICAL (general) R	cial protection is approved respirator for minimized vapor at elevated econsmended.	NFORMATION Ists and/or organic vapor should be worn SPECIAL None known to Eastman. OTHER None known to Eastman. ON
Specify type! VENTILATION ROTECTIVE GLO OTHER PPOTECTI	Observe all Federal, statement of the control of th	cial protection is approved respirator for minimized vapor at elevated econsmended.	NFORMATION Ists and/or organic vapor should be worn SPECIAL None known to Eastman. OTHER None known to Eastman.
ESPIRATORY PRO Specify type! /ENTILATION PROTECTIVE GLO OTHER PPOTECTI QUIPMENT	SECTION VIII SPE SECTION VIII SPE OTECTION An appropriate NIOSH if needed. LOCAL EXHAUST If needed to con icompetatures. MECHANICAL (general) R VES None should be needed. /E None should be needed.	cial protection is approved respirator for minimized vapor at elevated econsmended.	NFORMATION Ists and/or organic vapor should be worn SPECIAL None known to Eastman. OTHER None known to Eastman. ON ould be worn in any type of industrial operation

The information contained herem is furnished without warranty of any kind. Employers should use this information only as a supplement to other information gathered by them and must make independent determinations of situability and completeness of information from all sources to assure proper use of these materials and the safety and health of employees.

TLV (see Section V).

No eye hazard known to Eastman; however, any material gotten into the eye should be washed out immediately and medical attention obtained if symptoms persist after washing. Appropriate ventilation may be necessary at operations with elevated temperatures or where mists or serosols are encountered. Maintain workroom air concentration below the specified

EASTMAN KODAK COMPANY APPROVED BY U.S. DEPARTMENT OF LABOR "ESSENTIALLY SIMILAR" TO FORM OSMA-20.



ECP 2079-17 (8-79)	MAIERIAL 3	AFEIT DATA 3	MEE! K	coud 12-4-84	
		SECTION I			
PRODUCT NAME:	KODAFLEX® DOP Plastic	izer (150gal)(123ch	SIZE:	Not applicable.	
CHEMICAL NAME:	Dioctyl Phthalate [Bis(2-ethylhexyl) Phthalate] 4028 CAS No. 117-81-7				
FORMULA:	C4H4(COOCH2CH[C2H4]C4H	C4H4(COOCH2CH[C2H4]C4H4)2			
MANUFACTURER:	Marketed by Eastman Chemical	Products, Inc.			
ADDRESS:	Kingsport, Tennessee 37662				
FOR INFORMATION ON I	Mone HEALTH HAZARDS CALL: all or	day thru Friday, 8 a.m5 p.m. (ther times (615) 247-0411, Ext.	Eastern), (615) 4666) 247-0411, Ext. 3613;	
FOR OTHER INFORMATIO	Same number as above N CALL: Extension 2978	INFORMATION EFFECT	TIVE AS OF.	January, 1980	
	SECTION II HAZARDO	US INGREDIENTS OF MI	XTURES		
PRINCIPAL HAZARDOUS C	OMPONENT (S)		%	TEV (Units)	
Not applicable.					
	SECTION	III PHYSICAL DATA			
BOILING POINT (°F.)	724°F (384°C)	SPECIFIC GRAVITY (H;O	1) 0.98) 0.985 @ 20°/20°C	
VAPOR PRESSURE (mm Hg.) 1.2 @ 200°C	PERCENT VOLATILE BY VOLUME (%)	Not	Not applicable.	
VAPOR DENSITY (AIR = 1)	13.5	EVAPORATION RATE	Not	Not applicable.	
SOLUBILITY IN WATER	Negligible.				
APPEARANCE AND ODOR	Clear liquid, little or no	Clear liquid, little or no odor.			
	SECTION IV FIRE AP	ND EXPLOSION HAZARD	DATA		
FLASH POINT (Method user	dl 420°F (216°C) COC	FLAMMABLE LIMITS		el Uel 87 Not determined	
EXTINGUISHING MEDIA	Dry Chemical, Water Sp	# 474°E 1764°C 1		(264°C)	
SPECIAL FIRE FIGHTING PROCEDURES		Wear self-contained breathing apparatus and protective clothing to prevent contact with skin or eyes.			
UNUSUAL FIRE AND EXPLOSION HAZARDS	None known to Eastma	n.	<u> </u>		

FOT KODAFLEXO DOP PLASTICIZER [BIS(2-ETHYLHEXYL)PHTHALATE] (PM 401)

SILLIF IUM IUM NU.				
3507-9				
PAGES	EFFECTIVE DATE			
3	November 1979			

Recenced 12-4-84

A. CENERAL

A-1. This specification describes a grade of Kodaflex® DOP Plasticizer [bis(2-ethylehxyl) phthalate] which must meet all of the requirements listed below when tested as directed on the following pages.

A-2. See attached Material Safety Data Sheet No. 6106 for safety precautions for Kodaflex® DOP Plasticizer.

B. PROPERTIES

B-1. Color (Platinum-Cobalt Scale) 25 maximum

0.9840 - 0.9860 B-2. Specific Gravity at 20°/20°C

B-3. Acidity, as Phthalic Acid 0.01% maximum

B-4. Ester, as Bis (2-Ethylhexyl) Phthalate 99.02 minimum

B-5. Heat Test Color (Platinum-Cobalt Scale) 50 maximum

B-6. Odor Essentially odorless

B-7. Appearance Free from insoluble matter or haze

C. SAMPLING

C-1. Use clean, dry, narrow-south glass-stoppered bottles or clean, dry, narrow-mouth screw-cap bottles with aluminum foil-lined caps. Do not allow rubber or any other contaminating material to come in contact with the sample.

C-2. From each manufactured lot of material drummed, prepare a composite sample of not less than one pint. Sample at least 10% of the drums or three drums, whichever is greater; if the lot consists of three or fever drums, sample each drum. Withdraw the sample from the center of each drum by means of a "thief" or other sampling device. Prepare the composite by mixing equal volumes from each drum sampled.

C-3. From tank car or other large vessel, obtain a representative one-pint sample in the following manner. Place the sample bottle in a clean, stainless steel bottle holder and rinse the bottle with the material to be sampled. Then lower the unstoppered bottle to the bottom of the vessel and immediately withdraw to the surface. Maintain a uniform speed in lowering and raising such that the bottle is filled to approximately the bottom of the concave portion of the bottle as it reaches the surface of the liquid. If the vessel contains more than one compartment, prepare a composite sample by mixing approximately proportional volumes from each compartment.

Specification 3507-9

D. METHODS OF TESTING (Numbers correspond to those in Section B)

D-1. Color (Platinum-Cobalt Scale)

Determine the color of the sample as directed in ASTM Designation: D 1209-69, "Method of Test for Color of Clear Liquids (Platinum-Cobalt Scale)."

D-2. Specific Gravity at 20°/20°C

Determine the specific gravity of the sample as directed in ASTM Designation: D 891-59, "Methods of Test for Specific Gravity of Industrial Aromatic Hydrocarbons and Related Materials," Method C, "Specific Gravity by Means of a Pycnometer."

D-3. Acidity, as Phthalic Acid

Determine the acidity of the sample as directed in Tennessee Eastman Company Analytical Method TEAD-A-AN-G-VA-14-2, "Total Acidity."

D-4. Ester, as Bis(2-Ethylhexyl) Phthalate

Determine the ester content of the sample as directed in Tennessee Eastman Company Analytical Method TEAD-A-AN-G-VA-85-1, "Determination of Percent Ester in Plasticizers."

D-5. Heat Test Color (Platinum-Cobalt Scale)

Determine the heat test color of the sample as directed in Tennessee Eastman Company Analytical Method TEAD-A-AN-G-VCC-15-2, "Heat Test Color."

D-6. Odor

Remove the sample bottle cap and smell the sample in the bottle. Report as "essentially odorless" if no significant odor is detected. Report as "odor present" if easily perceptible odor is found.

D-7. Appearance

Determine the presence or absence of any haze or insoluble matter by . visual inspection of the sample.

E. PACKAGING

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E-1. The material will be supplied in steel drums, tank cars, or tank trucks in such a manner as to ensure acceptance by common or other carriers and to comply with United States Department of Transportation (DOT) and tariff requirements and specifications for safe transportation at the lowest applicable rate to the point of delivery.

F. MARKING

- F-1. Each container shall be marked to show the manufacturer's name and product identification, the lot number (if applicable), and net weight.
- F-2. The material shall be marked, certified, labeled and described as required by DOT regulations and any additional properly authorized regulations not inconsistent therewith.

APPENDIX: TEAD-A-AN-G-VA-14-2
TEAD-A-AN-G-VA-85-1
TEAD-A-AN-G-VCC-15-2
Material Safety Data Sheet No. 6106, "Kodaflex® DOP Plasticizer"



CODO78343407

Date: November 1, 1985

Revision No.: 0

Appendix C-2

APPENDIX CT2

EPA CRITERIA FOR IDENTIFYING A HAZARDOUS WASTE



CODO78343407

Date: November 1, 1985 ...

Revision No.: 0

Appendix C-2

EPA CRITERIA FOR IDENTIFYING A HAZARDOUS WASTE

The criteria which a generator must use to establish whether or not his waste is hazardous were published 19 May 1980 in 40 CFR, Part 261, Subpart B, revised as of 1 July 1984 (CDH Regulation 100.41). For a complete discussion of the criteria, the reader should consult the CFR or Colorado Hazardous Waste Regulation referenced above. Briefly, the EPA considers a waste having one or more of the following characteristics to be a hazardous waste: ignitable, corrosive, reactive, or toxic. These characteristics are defined by the EPA as follows:

- \$261.21 Characteristics of ignitability.
- (a) A solid waste exhibits the characteristic of ignitability if a representative sample of the waste has any of the following properties:
- (1) It is a liquid, other than an aqueous solution containing less than 24 percent alcohol by volume, and has a flash point less than than 60°C (140°F), as determined by a Pensky-Martens Closed Cup Tester, using the test method specified in ASTM Standard D-93-79, or a Setaflash Closed Cup Tester, using the test method specified in ASTM standard D-3278-78, or as determined by an equivalent test method approved by the Administrator under the procedures set forth in ##260.20 and 260.21.
- (2) It is not a liquid and is capable, under standard temperature and pressure, of causing fire through friction, absorption of moisture, or spontaneous chemical changes, and when ignited, burns so vigorously and persistently that it creates a hazard.

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CODO78343407

Date: November 1, 1985

Revision No.: 0

Appendix C-2

- (3) It is an ignitable compressed gas as defined in 49 CFR 173.300 and as determined by the test methods described in that regulation or equivalent test methods approved by the Administrator under ##260.20 and 260.21.
- (4) It is an oxidizer as defined in 49 CFR 173.151.
- (5) A solid waste that exhibits the characteristics of ignitability, but is not listed as a hazardous waste in Subpart D, has the EPA Hazardous Waste Number of DOO1.

of corrosivity.

- (a) A solid waste exhibits the characteristic of corrosivity is a representative sample of the waste has either of the following properties:
- (1) It is aqueous and has a pH less than or equal to 2 or greater than or equal to 12.5, as determined by a pH meter using either the test method specified in the "Test Methods for the Evauation of Solid Waste, Physical/Chemical Methods" (also described in "Methods for Analysis of Water and Wastes" EPA 600/4-79-020, March 1979), or an equivalent test method approved by the Administrator under the procedures set forth in ##260.20 and 260.21.
- (2) It is a liquid and corrodes steel (SAE 1020) at a rate greater than 6.35 mm (0.250 inch) per year at a test temperature of 55°C (130°F) as determined by the test method specified in NACE (National Association of Corrosion Engineers) Standard TM-01-69 as standardized in "Test Methods for the Evaluation of Solid Waste, Physical/Chemical Methods," or an equivalent test method approved by the Administrator under the procedures set forth in ##260.20 and 260.21.
- (b) A solid waste that exhibits the characteristics of corrosivity, but is not listed as a hazardous waste in Subpart D, has the EPA Hazardous Waste Number of DOO2.



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**261.23

· of reactivity.

- (a) A solid waste exhibits the characteristic of reactivity is a representative sample of the waste has <u>any</u> of the following properties:
- (1) It is normally unstable and readily undergoes violent change without detonating.
- (2) It reacts violently with water.
- (3) It forms potentially explosive mixtures with water.
- (4) When mixed with water, it generates toxic gases, vapors, or fumes in a quantity sufficient to present a danger to human health or the environment.
- (5) It is a cyanide or sulfide bearing waste which, when exposed to pH conditions between 2 and 12.5, can generate toxic gases, vapors, or fumes in a quantity sufficient to present a danger to human health or the environment.
- (6) It is capable of detonation or explosive reaction if it is subjected to a strong initiating source or if heated under confinement.
- (7) It is readily capable of detonation or explosive decomposition or reaction at standard temperature and pressufe.
- (8) It is a forbidden explosive as defined in 49 CFR 173.51, or a Class A explosive as defined in 49 CFR 173.53, or a Class B explosive as defined in 49 CFR 173.88.
- (b) A solid waste that exhibits the characteristics of reactivity, but is not listed as a hazardous waste in Subpart D, has the EPA Hazardous Waste Number of DOO3.
- #261.24 Characteristic of Extraction Procedure (EP) Toxicity



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(a) A solid waste exhibits the characteristic of EP toxicity if, using the test methods described in Appendix II or equivalent methods approved by the Administrator under the procedures set forth in \$\ddot*260.20 and 260.21, the extract from a representative sample of the waste contains any of the contaminants listed in Table I at a concentration equal to or greater than the respective value given in that Table. Where the waste contains less than 0.5 percent filterable solids, the waste itself, after filtering, is considered to be the extract for the purposes of this section.

(b) A solid waste that exhibits the characteristic of EP toxicity, but is nsot listed as a hazardous waste in Subpart D, has the EPA Hazardous Waste Number specified in Table I below) which corresponds to the toxic contaminant causing it to be hazardous.

TABLE I-MAXIMUM CONCENTRATION OF CON-TAMMUNTS FOR CHARACTERISTIC OF EP TOMICITY

PA Nearthus Homes Number	Contempera	CONDENT'S- tion (miligrams per iner)
	Amore	6.0
		100.0
	Codemic	1.0
0007		\$.0 \$.0
COSS		0.2
0010		1.0
	She .	\$ 0
	Enenn (1,2,3,4,10,10-hexach-	
C013	1,4,4a,5.8.7.8.8e-octahydro- 1,4-ends. endo-5,8-emeth- ang-negatitations. Lindano (1,2,3.4.5.6-hexp- chlor-	0.4
	gevelenekane, gamma lagmer.	
0014	Methoxychlor (1.1.1-Transoro- 2.2-bs (p-methoxy- phane) athens).	10.0
D015	Tongenere (GuHuCl., Technical chlemates camphene, 87-49 percent officine).	
0014	2.4-O. (2.4-Oschlorophenosyace- tic acid).	10.0
0017	2,4,5-TP Silver (2,4,5-Trichlo- reshenonyprosionic scidi.	. •



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APPENDIX D.1

DRUM DISPOSAL PROCEDURES



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PROCEDURE FOR DISPOSAL OF EMPTY DRUMS (GENERATOR)

- 1. All drums that are marked "DEPOSIT. RETURN TO BLDG. 551 WHEN EMPTY" are to be sent to PU&D for return to the original vendor. Drums with this marking are not to be used for any other purpose.
- Drums sent to Building 774 for processing may be disposed of, when empty, by following the procedure in paragraph 3 or by returning them to the generator for reuse. Every empty drum shipped from Building 774 must have an "ON-SITE USE ONLY" label affixed to the top of the drum.
- 3. For all drums not covered by paragraphs 1 or 2, the following procedure is to be used:
 - 3.1 Obtain a Waste Processing Request Form (RF-46367) from the warehouse.
 - 3.2 Fill out the top portion of the form. Include a description of the material formerly held in the drum.
 - 3.3 Have Radiation Monitoring survey the drum and provide the required data and signature on the form.



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- 3.4 Send the completed form to the appropriate department (Waste Operations, Building T668 for radioactive waste, or to Environmental Control, Building T452B for nonradioactive waste).
- 3.5 Retain control of the empty drum until a copy of the form is returned to you with directions regarding where to send the drum.
- 3.6 Send the empty drum to the location specified on the returned form.

PROCEDURE FOR DISPOSAL OF EMPTY DRUMS (ENVIRONMENTAL CONTROL AND WASTE OPERATIONS)

1. EVALUATE HAZARD CATEGORY

- 1.1 NONHAZARDOUS AND ENVIRONMETALLY SAFE The drum can go to the sanitary landfill or be cleaned for reuse.
- 1.2 HAZARDOUS WASTE This applies to characteristic or listed wastes as shown in 40 CFR, Part 261.21 through 261.33. The drum can be rinsed prior to reuse or disposal as nonhazardous waste.

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- 1.3 ACUTELY HAZARDOUS WASTE Acutely hazardous wastes are identified in 40 CFR, Part 261.33(e). Empty drums that previously held an acutely hazardous waste are defined as hazardous wastes. The drum must be triple rinsed prior to reuse or disposal as nonhazardous waste.
- Provide written direction on the Waste Processing Request Form regarding where the generator should send the empty drum.
- 3. Return the form to the generator.

BUILDING 889 DRUM RINSING OPERATIONS

1. RECEIVING

1.1 Control - The Waste Processing Request Form will be used to control the type and number of drums which will be accepted for rinsing at any one time. Personnel and space allotments will initially be based on an estimate obtained from warehouse personnel. The initial estimate will be adjusted as practical experience warrants.



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2. STORING

Two cargo containers will be used for storage. One will house the incoming drums and the other the rinsed drums. This will allow a maximum of about 40 drums on hand at any one time. Reaction or containment from incompatible and leaking drums should not be a concern (regarding storage) if the drums are empty.

3. RINSING

i _

3.1 The regulations 261.7(b)(3)(i) require acutely hazardous waste drums be triple rinsed with an "appropriate solvent" before disposing of the drum as nonhazardous. The regulations do not require that drums returned to the original vendor be rinsed. Empty drums that contained corrosives and toxics and are being recycled to off-site facilities are required by DOE to be rinsed. The decontamination workers at the facility are not expected to make all the necessary decisions. Rather, the Waste Processing Request Form should be reviewed by the hazardous waste coordinator before reaching the decon supervisor. The coordinator will screen each WPRF and note which drums should go directly to the warehouse, which should be rinsed, what to use for the rinse, how to dispose of the rinsate, and where to send the rinsed drums. The decon supervisor will be required to match the drums with the WPRF and to follow the directions provided.

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- 3.2 A minimum amount of supplies and equipment will be required for this operation. This would include the following:
 - A supply of rinse reagents.
 - A rinsing device.
 - A transfer system for rinse solution and rinsate.
 - A collection, storage, and shipping setup for rinsate that cannot go directly to process waste.
 - Personnel protective clothing and respiratory equipment.
- 3.3 For corrosive and reactive chemicals, water is likely to be the rinse solution. For ignitable and toxic organics, a solvent that can be incinerated or solidified will likely be used.

4. RINSATE DISPOSAL

4.1 The rinsate from the drums will be considered a hazardous waste by the EPA. Accordingly, it will require treatment, storage, and disposal (TSD) in compliance with the regulations. The TSD requirements will be specified by the hazardous waste coordinator on the WPRF prior to sending the form to the decon supervisor.

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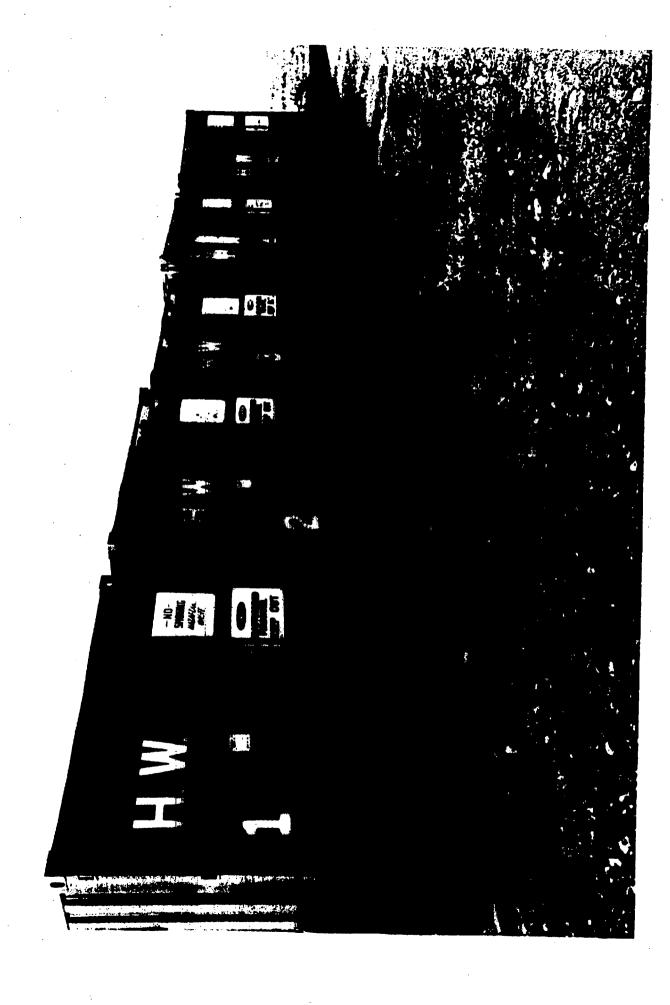
- 4.2 Factors involving TSD of the rinsate will be decided on an individual basis; however, the following general techniques will likely be used:
 - Water rinse dispose to the process drain or in rare cases soldify in cement.
 - Organic rinse incinerate or in some cases solidify in envirostone.

5. DISPOSITION OF DRUMS

Rinsed drums will be sent to the warehouse with an "EMPTY-RINSED" tag attached to the drum.

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APPENDIX H-1

DOT Hazardous Materials Class Material

HAZARDOUS MATERIALS CLASS SUBJECT MATTER

- GENERAL INFORMATION
- PACKAGING, LABELING AND STORING
- DOT TRAINING SLIDES
- RCRA
- SHIPPING AND RECEIVING

HAZARDOUS MATERIAL

A HAZARDOUS MATERIAL IS "A SUBSTANCE OR MATERIAL WHICH HAS BEEN DETERMINED BY THE SECRETARY OF TRANSPORTATION TO BE CAPABLE OF POSING AN UNREASONABLE RISK TO HEALTH. SAFETY. AND PROPERTY WHEN TRANSPORTED IN COMMERCE."

HAZARDOUS WASTE

"[S] OLID WASTE. OR COMBINATION OF SOLID WASTES, WHICH BECAUSE OF ITS QUANTITY, CONCENTRATION OR PHYSICAL, CHEMICAL OR INFECTIOUS CHARACTERISTICS MAY

- (A) CAUSE, OR SIGNIFICANTLY CONTRIBUTE TO AN INCREASE IN MORTALITY OR AN INCREASE IN SERIOUS IRREVERSIBLE, OR INCAPACITATING REVERSIBLE ILLNESS, OR
- (B) POSE A SUBSTANTIAL PRESENT OR POTENTIAL HAZARD TO HUMAN HEALTH OR TO THE ENVIRON-MENT WHEN IMPROPERLY TREATED, STORED, TRANSPORTED OR DISPOSED OF OR OTHERWISE MANAGED.

A SOLID WASTE HAS BEEN DEFINED BY CONGRESS AS:

"ANY GARBAGE, REFUSE, SLUDGE FROM A WASTE TREATMENT PLANT, WATER SUPPLY TREATMENT PLANT, OR AIR POLLUTION CONTROL FACILITY AND OTHER DISCARDED MATERIAL INCLUDING SOLID, LIQUID OR CONTAINED GASEOUS MATERIAL RESULTING FROM INDUSTRIAL, COMMERCIAL, MINING AND AGRICULTURAL OPERATIONS, AND FROM COMMUNITY ACTIVITIES."

(EMPHASIS ADDED.)

CHARACTERISTICS OF HAZARDOUS MATERIAL

ROCKY FLATS DOT		EPA	
TOXIC FLAMMABLE REACTIVE (01234)	EXPLUSIVES (A.B.() FLAMMABLE LICUID AND SOLID OXIDIZERS CORROSIVE LIQUIDS COMPRESSED GAS POISONS (A.B.C) RADIOACTIVE CRYOGENIC ETIOLOGIC	IGNITABILITY CORROSIVITY REACTIVITY EP TOXIC LISTED WASTE	

REGULATIONS

FEDERAL

THERE ARE THREE FEDERAL LAWS THAT CONTROL HAZARDOUS MATERIALS:

- * PUBLIC LAW 93-633 ESTABLISHED THE TRANSPORTATION ACT OF 1974. (DOT) (CFR 49,PART 172) (GRAZIANO'S TARIFF)
- * THE RESOURCE CONSERVATION AND RECOVERY ACT (RCRA) OCTOBER 26, 1976. (EPA) (CFR 40 PART 265)
- * THE TOXIC SUBSTANCES CONTROL ACT (TSCA)
 OCTOBER 11, 1976 (EPA) (CFR 40, PART 700)

STATE

- * STATE HEALTH DEPARTMENT
- * ROCKY FLATS MONITORING COMMITTEE

ECCKY FLATS

- BUILDING REGULATIONS
- * HS & E MANUAL
- * OSA
- * QUALITY PROGRAM PLAN
- PACKAGING, SHIPPING AND TRANSPORTATION FLAN

LIABILITY

- A. UP TO \$10,000 PER DAY PER PERSON RESPONSIBLE WHILE THE SHIPMENT IS IN TRANSIT
- B. FOR WILLFUL VIOLATIONS. UP TO \$25,000 PER DAY PLUS POSSIBLE FIVE YEARS IN JAIL OR BOTH.
- C. PENALTIES ARE SET FORTH IN FEDERAL LAW 93-633, KNOWN AS THE TRANSPORTATION SAFETY ACT OF 1974.
- D. SHIPMENTS OF HAZARDOUS MATERIALS ARE SUBJECT TO "DOT" INSPECTION AT ANY TIME ON PLANT SITE OR WHILE IN TRANSIT.
- E. IF AN IMPROPER SHIPMENT IS MADE, ALL THOSE INDIVIDUALS (PACKER, DRIVER, ETC., AND THEIR SUPERVISION) ARE PERSONALLY LIABLE.

RADIATION

RAD IOACT IVITY

CRITICALITY

ALPHA RAYS

MASS

BETA RAYS

GEOMETRY

GAMMA RAYS

REFLECTION

(X-RAYS)*

INTERACTION

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PLASTIC, OKGANIC MATERIALS CONMON MODERFILONS! WATER, OIL,

FISSILE MATERIALS

- A. A FISSILE MATERIAL IS ONE WHICH, IN CERTAIN QUANTITIES AND CONFIGURATIONS, IS CAPABLE OF CAUSING A CHAIN REACTION (MASSIVE, HIGH RELEASE OF ENERGY). THE FIVE ELEMENTS WHICH ARE FISSILE. RE: FU 238, FU 239, PU 241, U 233, AND U 235.
- B. CARE MUST BE TAKEN TO ENSURE THAT THE AMOUNT OF FISSILE MATERIAL IN ONE LOCATION DOES NOT EXCEED THAT AMOUNT WHICH IS CAPABLE OF CAUSING A CHAIN REACTION. THE TRANSPORT INDEX TELLS HOW MANY CONTAINERS MAY SAFELY BE STORED IN ONE AREA. THE TRANSPORT INDEX IS WRITTEN ON THE RADIOACTIVE II OR III LABEL ON THE CONTAINER.
- C. RADIOACTIVE MATERIALS ARE CLASSIFIED AS RADIOACTIVE 1. II. OR III AND MUST BE LABELED APPROPRIATELY.

PACKAG ING

LABELING

STORING

DEPARTMENT OF TRANSPORTATION BAZARDOUS MATERIALS TABLES

(49 CFR 172.101 and 172.102; Revised as of October 1, 1979; 45 FR 34560, May 22, 1980; 45 FR 43761, June 30, 1980; 45 FR 46419, July 10, 1980; 45 FR 62079, September 18, 1980; 45 FR 74640, November 10, 1980)

Section 172.101-Hazardous Materials Table*

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TYPES OF CONTAINERS

KNOW THE TYPES OF CONTAINERS USED AT ROCKY FLATS.

TYPES OF CONTAINERS:

- PROVIDING THEY HAVE BEEN BROUGHT BACK UP
 TO "DOT" SPECIFICATIONS AND INSPECTED.
 - (2) NRC NON-REUSABLE (ONTAINER, MAY NOT BE REUSED FOR HAZARDOUS MATERIALS UNDER ANY CONDITIONS AND SHOULD BE DESTROYED.
 - (3) FIBERBOARD BOXES SPECIFICATIONS ARE FOUND ON THE BOTTOM OF EACH CARTON. THEY REFER TO MANUFACTURER, BURSTING STRENGTH, VOLUME, ETC. BANDS, TAPE, OR LABELS SHOULD NOT BE PLACED OVER THIS AREA.
 - (4) SPECIALLY MADE WOOD BOXES. MADE BY MAINTEN-ANCE DEFT. MUST MEET SPECIFICATION IN CFR 49.
 - PAINTED WHITE OR BUFF COLOR. ONCE THEY ARE PUT INTO SERVICE, THEY MUST BE KEPT INDOORS IN AN ATTENDED AREA.
 - (6) THE TYPE CONTAINED TO BE USED FOR BUCK TYPE AND AMOUNT OF HAZARDOUS WATERIAL IS SECOFFIEL IN OFF AB.

DRUM INVENTORY AND RECORDS

BE FAMILIAR WITH RECORD KEEPING PROCEDURES USED TO TRACK RADIOACTIVE SHIPPING DRUNS AT ROCKY FLATS.

- A. EACH RADIOACTIVE SHIPPING CONTAINER HAS AN INDIVIDUAL CONTROL NUMBER.
- B. FILES ARE RETAINED FOR THE LIFE OF THE CONTAINER, STATING WHERE IT HAS BEEN, THE INSPECTIONS IT HAS GONE THROUGH, ETC.

PROCEDURE FOR SPILL OR DAMAGED CONTAINER

- " IF CONTAMINATION IS SUSPECTED, CALL RADIATION MONITORING TO CHECK.
- * DO NOT MOVE THE CONTAINER OR ALLOW OTHERS TO WALK THROUGH THE AREA.
- CALL SUPERVISION.
- * IF A CONTAINER HAS BEEN CONTAMINATED, IT MAY NOT BE USED AGAIN UNTIL IT HAS BEEN PROPERLY DECON-TAMINATED AND CHECKED BY RABIATION MONITORING.

RE-PACKAGING HAZARDOUS MATERIALS

- A. WHENEVER STANDARD PACKAGES OR CARTONS OF HAZARDOUS MATERIALS MUST BE BROKEN DOWN INTO SMALLER AMOUNTS. THE NEW PACKAGES MUST BE LABELED PROPERLY WITH THE CONTENTS.
- B. A HAZARDOUS MATERIAL SHOULD NOT BE POURED INTO A CONTAINER WHICH PREVIOUSLY HELD ANOTHER HAZARDOUS MATERIAL UNLESS
 - (1) THE CONTAINER HAS BEEN PROPERLY WASHED
 - (2) THE OLD LABEL HAS BEEN REMOVED AND A NEW ONE PUT ON

- A. MARKINGS ARE STENCILED ON. THE PROPER NAME FROM CFR 49 MUST BE PERMANENT AND PRINTED IN ENGLISH ON THE OUT SIDE OF EVERY PACKAGE IN LETTERS AT LEAST 1/2 INCH HIGH. OTHER MARKINGS MAY INCLUDE INFORMATION SUCH AS "FRAGILE". "NO HOOKS", ETC.
- B. LABELS ARE ATTACHMENTS APPLIED OR IMPRINTED ON CON-TAINERS INDICATING THE HAZZED CLASS OF THE MATERIALS INSIDE. ALL HAZARDOUS MATERIALS MUST BE LABELED UNLESS SPECIFICALLY EXEMPTED.
- C. EACH PACKAGE MUST HAVE A MINIMUM OF ONE LABEL. RADIO-ACTIVE SHIPMENTS REQUIRE TWO LABELS, PLACED 180° FROM EACH OTHER (ON OPPOSITE SIDES OF THE CONTAINER).
- D. MULTIPLE HAZARD MATERIALS (THOSE REPRESENTING MORE THAN ONE HAZARD SUCH AS PLUTONIUM NITRATE WHICH IS BOTH RADIOACTIVE AND CORROSIVE) MUST HAVE MULTIPLE HAZARD LABELS.
- E. AT ROCKY FLATS, ALL OF THE REQUIRED HAZARDOUS LABELS ARE PLACED TO THE RIGHT OF THE ADDRESS LABEL ON PACKAGES. ON DRUMS, THE REQUIRED LABELS ARE PLACED BENEATH THE CLOSURE. A DUPLICATE SET OF LABELS IS PLACED 180° OPPOSITE THE FIRST SET IN EACH CASE.

- EMPTY CONTAINERS. ALL PREVIOUS MARKINGS AND LABELS MUST BE REMOVED FROM EMPTY LABEL WITH BLACK LETTERING ON A YELLOW BACKGROUND WHITE BACKGROUND. OTHER CONTAINERS USE A 3 X 6 INCH ACTIVE CONTAINER IS 6 X 6 INCHES, BLACK LETTERING ON A WITH AN EMPTY TAG. MAKE SURE THERE IS NO NESIDUE LEFT EMPTY CONTAINERS BUST BE SECURELY (LOCED AND LIBELED IN THE CONTAINER. THE PROPER EMPTY TAG FOR A RADIO-
- ADHESIVE-BACKED LABELS WILL NOT STICK TO WOOD CARTONS THEY MUST BE TACKED ON.
- RAD IOACTIVE. THE ONE LABEL SHOULD BE NEAR THE OPEN-ONLY ONE HAZARDOUS LABEL IS REQUIRED UNLESS (1) THE CONTAINER EXCEEDS 64 CUBIC FEET, (2) THE MATERIAL IS ING OR CLOSURE.
- PACKAGES TO ENSURE UNIFORMITY OF PRACTICE AND ENSURE AGAINST FALLING OFF. AT ROCKY FLATS, TWO LABELS ARE USUALLY USED ON ALL
- HAZIRIUBS LABELS ON CONTAINERS SOME DAUM BAD BOX RENOTES TORERS THE THE SECTION OF SECTION 150
- STENCILED SHIFMENTS WEIGHING IN EXCESS OF THE GROSS WEIGHT OF ALL UNCLASSIFIED, RADIOACTIVE ON THE CONTAINER. MUST BE

- L. UNDER NO CIRCUMSTANCES MAY A HAZARDOUS MATERIAL BE. SHIPPED IN A CONTAINER LABELED FOR ANOTHER HAZARD.
- M. HAZARDOUS MATERIALS IN LIQUID FORM MUST HAVE LABELS WITH AN ARROW READING. "THIS END UP". LIQUIDS SHOULD BE PACKAGED WITH ENOUGH ABSORBENT TO ABSORB THREE TIMES THE VOLUME OF THE LIQUID.
- N. ALL CONTAINERS MUST HAVE AN ADDRESS LABEL INCLUDING THA NAME AND ADDRESS OF THE CONSIGNEE AND THE CONSIGNOR.
- O. IF THE MATERIAL IS HAZARDOUS WASTE, EACH CONTAINER OF 110 GALLONS OR LESS USED FOR TRANSPORT OF THE HAZARDOUS WASTE MUST BE SPECIFICALLY MARKED WITH:

"HAZARDOUS WASTE, FEDERAL LAW PROHIBITS
IMPROPER DISPOSAL. IF FOUND CONTACT THE
NEAREST POLICE OR PUBLIC SAFETY AUTHORITY
OR THE UNITED STATES ENVIRONMENTAL PROTECTION AGENCY."

ROCKMELL HATER WITHOW AL ROCKY FLATS PLANT P.O.BOX 464 GOLDEN, COLORADO 80401

N	ΪF	ΞS	TN	Uiii	BER	

STORAGE PROCEDURES

- A. HAZARDOUS MATERIALS SHOULD NEVER BE STACKED UNLESS ONE HAS SPECIFIC INSTRUCTIONS TO DO SO.
- B. NUCLEAR SAFETY HAS PRE-ESTABLISHED SAFE STORAGE LIMITS FOR SPECIFIC SIZED CONTAINERS IN SPECIFIC STORAGE AREAS. THESE LIMITS SHOULD NOT BE EXCEEDED UNDER ANY CIRCUMSTANCES.
- C. FISSILE MATERIALS MUST BE KEPT SPACED APART (USING MINIMUMS PROVIDED BY NUCLEAR SAFETY).
- D. THE NUCLEAR SAFETY DEPARTMENT IS THE FINAL AUTHORITY IN DETERMINING THE VOLUME OF MATERIAL WHICH CAN BE SAFELY STORED IN A SPECIFIC AREA.
- E. THE TRANSPORT INDEX TELLS YOU HOW MANN ROTION CTIME CONTAINERS MAY SAFELY BE STORED IN ANY SIVEN AREA. THE TOTAL INDEX FOR ALL CONTAINERS INDIVINERS AREA SHOULD NOT EXCEED 50.
- F. THE TRANSPORT INDEX OF SPECIFIC SUBSTANCES IS PRE-DETERMINED BY NUCLEAR SAFETY OR BY A READING FROM HEALTH PHYSICS (RADIATION MONITORING). TO DISTANCE OF ONE METER.

SHIPPING

AND

RECEIVING

PLACARDING VEHICLES CARRYING HAZARDOUS MATERIALS

- A. THE REQUIRED PLACARDING FOR A GIVEN HAZARDOUS MATERIAL IS FOUND IN CFR 49.
- E. THE SHIPPER IS RESPONSIBLE FOR PROVIDING THE PLACARDS.
- C. THE DRIVER MAY REFUSE THE PLACARDS WHICH ARE OFFERED IF HE HAS HIS OWN. THIS MUST BE NOTED ON THE SHIPPING PAPERS.
- D. IT IS THE DRIVER'S RESPONSIBILITY TO SEE THAT THE VEHICLE IS PROPERLY PLACARDED.
- E. THERE MUST BE PLACARDS ON EACH SIDE OF THE VEHICLE, OWE ON THE FRONT AND ONE ON THE REAR.
- Fig. IF CAVEHICLE IS CARRYING MORE THAN ONE TYPE OF HADARDOOS MATERIAL, IT MUST BE ALTOMOSED FOR EXCRIP

NOTE:

THE TRANSPORT INDEX APPLIES TO SHIPPING OF HAZARDOUS MADERIALS (RADIOACTIVE) IN THE SAME CONTEXT DESCRIBED FOR STOPICS.

SHIFF INE PREERS

- A. THE DRIVER IS RESPONSIBLE FOR THE SHIPPING PAPERS WHILE IN TRANSIT.
- B. SHIPPING PAPERS MUST BE KEPT ON THE SEAT NEXT TO THE DRIVER. WHEN THE VEHICLE IS UNATTENDED, THEY MUST BE KEPT ON THE DRIVER'S SEAT OR IN THE LEFT HAND POCKET.
- C. THE SHIPFING PAPERS MUST CONTAIN THE NAMES AND ADDRESSES OF THE CONSIGNEE AND CONSIGNOR. HAZARDOUS MATERIALS MUST BE (1)LISTED FIRST, (2)HIGHLIGHTED, OR (3)CHECKED IN A SPECIAL COLUMN.
- D. HAZARDOUS WASTE MUST BE ACCOMPANIED BY A MANIFEST. THIS MAY BE INCORPORATED INTO EXISTING SHIPPING PAPERS BUT IT MUST INCLUDE INFORMATION BEYOND THAT REQUIRED BY "DOT".
- E. THE EILLOF LADING WHICH MOST INCLODE:
 - CLOTHE PROFER NAME (FROM CFR ASSOF THE CONTENTS.
 - (2) THE NUMBER OF ITEMS.
 - (3) HAZARDOUS MATERIALS SHOULD BE LISTED FIRST, HIGH-LIGHTED, OR CHECKED IN A SPECIAL COLUMN.
 - (4) ANY SPECIAL INSTRUCTION FOR HANDLING SUCH AS "FRAGILE", "DO NOT DROP", ETC.
 - KENTHE NAME AND ALLRESS OF THE CONSIGNEE AND CONSIGNAL
 - CENTONIA MEN CHIEG AND MEDDANS.

TRANSPORTATION ACCIDENTS (APPROPRIATE / CTICLS)

- A. CONTACT ROCKY FLATS DISPATCHER.
- B. REQUEST AID FROM HEALTH PHYSICS.
- C. KEEP BYSTANDERS AWAY AND UPWIND.
- D. DO NOT ALLOW ANYONE TO MOVE CONTAINERS.
- E. IF THE DRIVER SUSPECTS THAT THE VEHICLE IS CON-TAMINATED, RADIATION MONITORING SHOULD BE CALLED TO CHECK THE VEHICLE.
- F. CONTACT THE CHEMICAL TRANSPORTATION EXERGENCE CENTER (CHEMTREC) 1-800-424-9566. GFERATED BY THE CHEMICAL MANGEACTURERS ASSOCIATION.

PROCEDURES FOR RECEIVING SHIPMENTS

- A. MAKE SURE HAZARDOUS MATERIALS ARE UNLOADED FIRST.
- B. SPACE RADIOACTIVE MATERIALS APART: DO NOT STACK.
- C. NOTE DAMAGE, OVERAGES, OR SHORTAGES ON SHIPPING PAPERS. SEND AN OVER-SHORT-DAMAGE REPORT TO TRAFFIC AND PURCHASING.
- D. IF DAMAGE IS SUSPECTED, DO NOT OPEN. CALL SUPERVI-SION IMMEDIATELY.

LOAD ING. UNLOAD ING. AND MOVING HAZARDOUS MATERIALS

- IHE ALL MATERIALS. FOR APPROVAL OF LOAD ING. BALGAD ING. AND MOVEMENT OF TRAFFIC DEPARTMENT AT ROCKY FLATS IS RESPONSIBLE
- HEALTH PHYSICS SHOULD BE CALLED WHENEVER THERE QUESTION OF CONTAMINATION. Э.
- WHEN LOADING OR UNLOADING A VEHICLE WHICH CONTAINS HAZARDOUS MATERIALS SHOULD BE HANDLED FIRST. BOTH HAZARDOUS AND NON-HAZARDOUS MATERIALS, THE
- ANY DAMAGE OR SHORTAGES MUST BE NOTED ON SHIPPING DOCUMENTS AT TIME OF RETENT
- いのでは、野田のののではいれて ECURED WITH PROPER TIE-DOWLS OR CHAINS. **(**: '

ON-SITE MATERIALS TRANSFER (PAPER WORK)

A. MATERIALS ARE MOVED BY:

MTR
ITR
WASTE DRUM TRANSFERS
RIRS - RECEIVING INSPECTION RECEIPT SHEET
SRS - SUPPLEMENTARY RECEIVING SHEET

B. MATERIAL TRANSFER AND INTERNAL TRANSFER RECEIFTS ARE USED TO MOVE MATERIAL AT ROCKY FLATS FROM ONE AREA, OR ACCOUNT, TO ANOTHER.

SPECIAL EXEMPTIONS

- A. SPECIAL EXEMPTIONS ARE GRANTED FOR ONE TIME ONLY.
- B. THE SPECIAL EXEMPTION NUMBER MUST APPEAR ON ALL SHIPPING CONTAINERS AND ALL SHIPPING PAPERS.

OVERSEAS SHIPMENTS

- A. OVERSEAS SHIPMENTS MUST MEET ADDITIONAL REQUIREMENTS OF "DOT" AND INTERNATIONAL REGULATIONS FOR PACKAGING, MARKING, AND LABELING.
 - E. DO NOT MOVE AN OVERSEAS SHIPMENT EXCEPT THROUGH DOE AREA OFFICE DIRECTION.



HAZARDOUS MATERIALS TRANSPORTATION

U.S Department of Transportation

Research and Special Proprams Administration

HAZARDOUS MATERIALS DEFINITIONS

The following definitions have been abstracts of a trace de of Federal Regulations. Title 49-Transportation, hart to be kefed to reterenced sections for sometimes with the setting. The section of the property is standing or a contemporate perfection of the section >BAVARIOUS NATIONAL</u> - Means a substance of material event has been determined by the Secretary of Transportation to be created as a single unreasonable risk technology, and property when transported as a trace, and which has been so designated. (Sec., 271.5)

MULTIFLE HAZARDS - A material meeting the desimities of more than one hazard class is classed according to the sequence place of the first.

HAZAND CLASS	100 Miles
	An Englishive - Any Chemicas of the continuous of devices the primary of common purpose of volume to the theorem by each cion. i.e., with representation, a state of the continuous contents of the contents o
CLASS A EXPLOSIVE	Detending or otherwise of manimum hazard. The nine types of Class A explosives are defined in Soc. 13.53.
CLAS: h EXPLOSIVE	In general, fartically regions a rise rather than detenation and include some employing declars some as special fireworks. That products of a limitable management (175.58)
CLASS C LXP (CVV)	Contain types of menutertuned riving containing Class A or Class I explorives, or high, as compared to an restricted quantities, and contain type of firewers of the containing Class A or Class
E Mark	The first of the special section of the section of
	and the second of the second o
Gogal De	 Service of the service /li>
	4. A series of the control of the

•	HAZAFI) CLASS	DEFINITIONS
	FLAMEL FILE GAS	Any compressed pur meeting the requirements for lower flammability limit, flow district limits from the least the properties of the land the purpose of the land the land the purpose of the land the lan
	NONILAMS 111	Any compressed per other than a flammable concressed gas.
	FILMMAFLE St. 19	Any solid motorial, other than at employing, which is lighly to course these three the course to be a fine or the course of the solid etailing on its estings as and the course to the course solvenously are personally as to create a serious transportation massive (Sec. 175.450)
	OK AND C PLACKIBE	can organic companie contained the tovalent -tof structure and which has be considered a neitherive of hydrogen peroxide where one or mate of the hydreger atom have been replaced by eigenic tradicals must be classed as or organic perceive unless—[See Sec. 173.11278] for deceive
		A substance such as or the persuagrante, line, and perculae, or a mitrate, that riels a copy, as readily to stimulate the combention of erganic matter. (See Sec. 173.151)
•	FO; 800 A	Extremaly Dampetous Polyco - buls more mases on liquid, of such lature that a very stall a content to persons to prove of the following as a super sea to late. The content is
	F61 05 1	less Dangerous Peissio - Lorstances. Diquide, on solids similating pastes and semi-solids), other than Clark A or Printating materials, which are known to be a tonic to man as to afford a hazard to health dering transportation; or which, in the absence of adequate data on human ten sity, are presented to be tenic to man. (Sec. 19215-2)
	PERTIAL IN MILEGIAL	District . Solid ser and a charge contact with time or when expected to the process of district in these and district in the contact in the c
	•	
-	•	

		HAZARD CLASS	14TINITIONS
		ORN-E	A material (including a solid when you with water) causing significant for the absolute valuable of various features along the following transportation. Materials meeting one the following collections: Given interpolate (i.e., a that has a corresion rate exceeding 0.250 anch per year with a aluminum (nonclad 7075-76) at a test temperature of 180%. A acceptable test is described in NACL Stanford Testing and (i.e.) Specifically designable by name in the collection (b. (c.))
		OIM-C	A material which me of finances of the street of the stree
		ORM-D	A material such as a consumer community of len, those characters subject to the regulations of this subcharter, presents a rational hazard during transportation due to the regulation of poles ing. They must be recommended to the restriction of the subcharge of the substance of
	;;	OKM-F	A material that is not included in any other hazard so lost subject to the record and of this such hazardous abstances class include (i) herardous wastes and (ii) Hazardous substances as defined in Sec. 171.8. [Sec. 173.500(b)(5)]
, 		THE FOLLOWING HAZARDOUS MATE CONSUMER COMMODITY (See ORM-D)	ARE OFFERED TO EXPLAIN ADDITIONAL TERMS USED IN PRETARATION OF ERIALS FOR SHIPMENT. (Sec. 171.8) Means a material that is packaged or distributed in a term item tended and suitable for sale through retail sale, and inclumentalities for consumption by individuals for personal care or household use. This term also includes draps and medicines. (Sec. 171.8)
		LASE FOINT	Means the minimum terms ourse at which a substance place of the mable vapors which in certain with a start or flar will make like little for the certain with a start of the certain of th
			For transporter. Or solutions, the property of the Hard Community rates or for one its spent with packaged, and then it is a first or for one its spent with the packaged, and then it is a first or for one its spent with the packaged, and then its spent with the packaged, and the packaged and the packaged

HAZARDOUS WASTES	For transportation purposes, means and material that is subject to the broardous restortanifest requirements of the Environmental Protection Amendous for CFR. Title 40. Part 123. Chapter P. (Sec. 171.3) For details on the Hazardous Waste and Consolidated Permit Regulations, refer to CFR. Title 40. Parts 260-267 and Parts 122-125. Questions regarding these regulations, call Toll Free: (800) 424-9346 or (202) 554-1403
LIMITUE QUANTITY	Means the maximum and on a real record activitation appears. I in those sections considered to the particular maxard class, for which there are specific emperiums from the requirements of this subchapter. See Sec. 17:1118, 173.118(a), 173.153, 173.244, 173.306, 173.345 and 173.367.
REPORTABLE	For transporters of process, teams the quantity of hazardous substance and/or house to the process of the contract to the contract to the substance to the contract to the con
SPONTANEOUSLY COMEDITIBLE MATERIAL (SOLID)	Means a solid the contine directions and pastes) which may underta apout a contine or solid indiction under conditions normally incident to them estation or which may upon contact with the atmosphere, undergo in increase in temperature and ignite. (Sec. 171.6)
WATER REACTIVE MATERIAL (SOLID)	Means any solid histance (including sludges and pastes) which, by interaction with there, is likely to become spontaneously flammable or to give off illumible or toxic gases in dangerous quantities. (Sec. 171.8)

NOTE: This handout is designed as a training aid for all interested parties who may become involved with hazardous materials. It does not relieve persons from complying with the Department of Transportation Hazardous Materials Regulations. Final authority for use of these hazard classes and definitions is found in CFR. Title 49, Parts 100-177.

Information Renviews Division, DMT-11 Office of operations and dotwoment Materials True oration Duresu Research of a left Programs Administration Department of the concentration Value of the concentration

NOTE: This material may be record which it special permission from this Bureau and any questions or commune to iterating this handout should be directed to the address above.

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115 Department // Transportation

lesearch and Special Programs Administration

GUIDE FOR MARKINGS

The following information has been abstracted from the Code of Federal Regulations (CFR), Title 49 Transportation, Parts 100-199. Refer to the appropriate Sections for details.

NOTE: Rulemaking proposals are outstanding or are contemplated concerning the regulations. Keep up to date with the changes.

MARKING - means the application of the descriptive name, proper shipping name, hazard class, identification number (when authorized), instructions, cautions, weight or a combination thereof on the outside shipping container. Marking also includes the specification marks for both the inside and outside shipping containers required by the Hazardous Materials Regulations.

DESCRIPTIVE INFORMATION

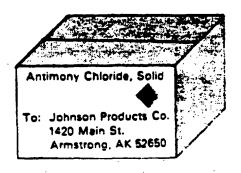
GENERAL REQUIREMENTS (\$172.300-172.304)

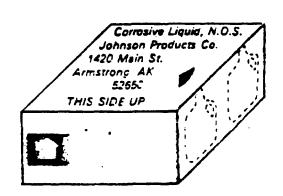
All containers of hazardous materials, i.e. packages, freight containers, or transport vehicles, must, unless specifically exempted, be marked with the proper shipping name(s) of the contents and the name and address or either the consignee or consignor. All markings must be:

- Durable, in English, and printed on or affixed to the surface of the package or on a label, tag or sign.
- On a background of a sharply contrasting color and unobscured by labels or attachments.
- 3. Away from other markings that could reduce its effectiveness.

LIQUIDS - INSIDE CONTAINERS (\$172.312)

- 1. Inside containers must be packed with closures in the upright position.
- Must be marked on the outside with "THIS END UP" or "THIS SIDE UP".
- 3. Arrows must be used only to show orientation of package. An arrow symbol indicated by ANSI Standard MH6.11968 "THIS WAY UP". Pictorial (arrows) of goods is recommended.





EXPORT BY WATER (\$172.302)

All n.o.s. entries, when authorized in \$172.101 or \$172.102, must have the technical name(s) of the material immediately following the proper shipping name for export by water. For mixtures (two or more) hazardous materials, the technical name of at least two components must be identified.

RADIOACTIVE MATERIALS (\$172.310)

- 1. Containers weighing over 110 pounds (gross weight) must be marked on the container.
- Must be marked "TYPE A" or "TYPE B" as required in letters at least 1/2" high.
- 3. For export, the letters "USA" must follow the specification markings or package certification.

OTHER REGULATED MATERIALS (ORM'S) (\$172.316)

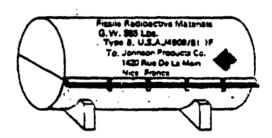
ORM materials must be designated immediately following or below the proper shipping name marking within a rectangular border approximately 1/4 inch larger on each side of the designation. The appropriate designation must be one of the following:

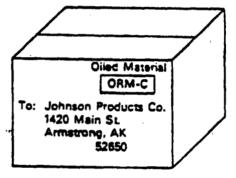
- 1. ORM-A
- __ ___
- 2. ORM-B -KEEP DRY
- 3. ORM-B
- 4. ORM-C
- 5. ORM-D
- 6. ORM-D-AIR
- 7. ORM-E
- NOTE: These markings serve as the certification by the shipper that the material is properly described, classed, packaged, marked and labeled (who appropriate) and in proper condition for transportation. Use of this type of

certification does not preclude the requirement for a certificate on the shipping tager 19172.316(c)].

Corrosive Liquio, N.O.S.
(Phosphoric Acid)

To: Johnson Products Co.
1420 Rue De La Main
Nice. France







EXAMPLE

AUTHORIZED CONTAINERS IN OUTSIDE CONTAINERS

When a DOT specification container is required for a hazardous material and that container is overpacked in another container meeting the requirements of \$173.21 and \$173.24, the outside container must be marked in accordance with \$173.25. EXAMPLES: "THIS SIDE UP" or "THIS END UP" or "INSIDE PACKAGES COMPLY WITH PRESCRIBED SPECIFICATIONS"

CYLINDERS - All cylinders must be marked in accordance with \$173.34 and \$\$173.591 through 173.306. Cylinders passing reinspection and retesting must be marked in accordance with \$173.54(c)(()).

PORTABLE TANKS (\$172.326 and \$172.332) - Portable tanks must display the proper hipping name in letters at least 2 inches high and placed on two opposite sides. dentification numbers [\$\$171.101 and 171.102 (when authorized)] are required on each side and each end for capacities of 1.000 gallons or more and on two opposing sides in association with the proper shipping name for capacities of less than 1.000 gallons. The name of the owner or lessee must be displayed. Tanks carrying compressed gases (DOT-51) must have all inlets and outlets, except safety relief valves, marked to designate whether or not they communicate with vapor or liquid. [\$178.245-6(b)].

NOTE: When different hazardous materials are transported in marked portable tanks, the shipping name and the identification number displayed must identify the material.

CARGO TANKS - HIGHWAY (COMPRESSED GASES) (\$172.328) - Cargo tanks must be marked, in letters no less than 2 inches high, with either the proper shipping name of the gas or an appropriate common name, such as "Refrigerent Gas". Cargo tanks must only be marked, i.e. proper shipping name and identification number (when authorized (\$\$171.101 and 171.102)) for the material contained therein. DOT MC 331 tanks must have inlets and outlets, except safety relief valves, marked to designate whether they communicate with liquid or vapor when the tank is filled to its maximum permitted silling density. [\$178.337-9(c)].

TANK CARS - RAIL (\$172.330) - Tank cars, when required to be marked with the proper shipping name by Parts 173 and 179, must be marked in letters at least 4 inches high with at least 5/8 inch stroke with the proper shipping name or the appropriate common name. Identification number markings (when authorized) must be displayed on each side and each end [\$\$171.101 and 171.102 (when authorized)]. Tank cars must only be marked for the material contained therein.

OTE: See referenced Sections for requirements for DOT-106 and DOT 110 tank car tanks.

EXAMPLE OF PLACARD AND PANEL WITH IDENTIFICATION NUMBER



NOTE: The Identification Number (ID No.) may be displayed on placards or on crange panels on tanks. Check the sides of the transport vehicle if the IP number is not displayed on the ends of the vehicle.

OTHIR MARKING PROVISEMENTS

11 Alling's CONTAINESS - Reusable on linders, principle tanks, cargo tanks and tank are acquired to be either visually impacted or retested at periodic intervals. But this is a complished, the date of the regualification must be shown on the journamer as required in \$\$173.24, 173.31, 173.32, 173.33 and 173.34.

.

REUSE OF CONTAINERS - Some steel containers in the DOT Series (DOT-17C, 17E and 17H) may be qualified for reuse by a reconditioner of drums who is registered with the Department of Transportation. These drums must meet the requirements of \$173.26(m) i.e. old labels removed, exemption number (if any) and descriptive markings removed and the drum reconditioned. Other containers may be reused under varying conditions. See \$173.28 for details.

CARGO HEATERS - Cargo heaters authorized for use with flammable liquid or gas must be marked in accordance with \$177.834(1)(2)(e) and (f).

MOTOR VEHICLES - Marking of motor vehicles and special requirements are found in \$177.823 and 177.824.

SPECIFICATION CONTAINERS

Markings on specification containers must generally identify: (1) the DOT specification number to which the container is made (Parts 178 and 179); (2) the manufacturers name and address or symbol (registered with the Associate Director for the Office of Hazardous Material Regulation). Duplicate symbols are not authorized. All containers must comply with the marking requirements of \$173.24 and the appropriate Section(s) of Parts 178 and 179. Exceptions for Canadian and other import/export situations may be found in \$\$171.12 and 173.8.

NOTE: For certain containers, specific detailed information such as original test date information and type of material which may be required can be found in Parts 178 and 179.

This publication does not contain all the marking requirements. It is designed as a guide only. For details for all markings, consult Code of Federal Regulations, Title 49, Parts 100-199.

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Department of Transportation
Research and Special Programs Administration
Materials Transportation bureau
Office of Operations and Inforcement
Information Services Division, DMI-11
Washington, D.C. 2009

Pi mazaruous materiais warning Placards

* Numbers in each square refer to (Illustration numbers). Tables 1 and 2. 2 BLASTING POISON AGENTS GAS ٥ 10 12 CHLORINI OXYGEN 13 14 15 17 18 OXIDIZER ORGANIC RADIOACTIVE PEROXIDE Rail Placards





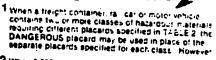


Highway Shipments





Dangerous Placard



2 When \$.000 pounds or more of one class of hazardous material is loaded at one loading facility, the placard in that class in TABLE 2 must be applied.

General Guidelines on Use of Placards

ble 1

Placard motor vehicles, freight containers, and rait cars containing "any quantity" of hazardous materials listed in TABLE 1.

Hazard Classes	No.
C et. 2 ex 1:02-161	1
Car B extresive:	2
FETT HILL FOANGEROUS	÷
Vimeta WET let e course	12
Retrue the meterial (YELLOW Hillate). Retruective meterial)	·.
Charling the structure of the second section of the section o	
	٠.
formalian a fluoride, low specific activity	v.
160"HB(5170" L. / fig. 10 L. / 1 m. 1	. 17

Placard motor vahicles and freight containers containing 1,000 pounds or more gross weight of hazardous materials classes listed in

Table 2 Piacard any quantity of hazardous materials classes listed in Tables 1 and 2 when offered for transportation b, air or water Pramara raw card containing my quantity of

Handro its mare into classe in stem in Table 1 except when less than 1 Dui 10 union gross weight of hazardors maler also stansported in TOFC (Transi on hat car or COFC (Container on her carrier live.

Hazard Classes Class C explosives	* No
Blasting agent	3
Nonflammable gas Nonflammable gas (Chlorine)	€ 7
Nontiammable gas (Fluoring Nontiammable gas	15
10xx gen in the surround the part	ē
Fire transfer of the State of t	. :
filomores e habita	٠
Flammante sono	11
Oxidizer Crystok person ng	15
Forson B	1 <u>.</u>
Corresive material	17
fritating material	îÉ

CARGO AND PORTABLE TANKS

- Carps tanks containing any quantity of falletiteus material num be placartier.
 - Fortish is better having a new recording to a real popular control of the recording to a real popular control of the real popular control
 - Portugi é to les rockers de la reconstruir del on which two only takes her

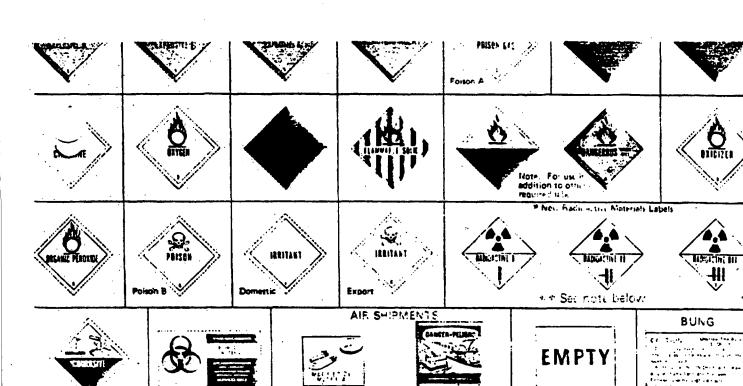
FREIGHT CONTAINERS

- Frank t Containers (640 Cubic Feet or Mills Ford Contended to the
 - An en Autonio Piacchino di depositione
 - Horward Fa Automotive of the second of th

OTHER PLACARDING REQUIREMENTS

- · Colorna Compating Flammable, one Chypen Placends 1. S. 172,504, Tebr. 2
- Fuer Gro Figures 5 272 544 tol.
- Gasotine Pier 11 Sci. 172,542(c)

- Sala de Berkerward für Bur Star dente Sei 170 f. O.L. und 170 50%.
- Emility Process > Sc. 172,525.



General Guidelines on Use of Labels

Magnetized

Arretate

Only

- 1 Each person who offers a hazardous material for ment must labe! the package containing trial, if required, with the appropriate la. (Sec. 172.400 (a))
- 2 Labels may be affixed to packages even though not required by the regulations provided each label represents a hazard of the material in the package. (Sec. 172 401)
- 3 Exceptions to the labeling requirements for limited quantities or certain hazardous materials are specified in the regulations.
- 4. The number abbearing at the bottom comer or some labels regressint the ON and IMCO transfer cass number. These are permitted, but not required by DOT regulations. (Sec., 179,401) go.
 - Labels) when required, must be affixed to or punted or the surface of the package near the marked proper shipping name. (Sec. 172,406 (a))
- 6 When two or more different warning labels are required, they must be displayed next to each other, (Sec. 172,406 in):
- While Two moves provided by control of compatible treated on the tool one package of within the some own, and the control of matter feeling a predimentary control of the matter of community in the control of the control matter of community.

- E Packages containing a sample of a hazardous material other than an explosive must be tabeled in accordance with the requirements of Sec. 172.402 (h). (For Explosives, see Title 49, CFR, Part 173, Subpart C)
- 9 A material classed as an Explosive A. Poison A, or Radioactive material, that also meets the definition of another hazard class imuet be labeled as required for each class. (Sec. 172 402 (a))
- 10 Packages containing Radioactive material, that also meets the offinition of one or more additional hazardo, must be labeled as a Radioactive material and for each additional hazard on obtion 1 story of the parkets. Supplied 4.13 and about the story of the parkets.
- 11 A meterial classon at an Oxidate fire matric solid, or Frammable bould, that also meets the definition of life confirmation of life positions and matrix of POEON in additionable to the matrix of the confirmation of the conf
- 12 A material classed as a Flammable solid, that also meets the definition of a water reactive material, must have both FLAMMABLE SOLID and DANGEROUS-WHEN WET labels affixed. (Sec. 172.402 (a) (d))
- NOTE Printing Errors

 RADIOACTIVE from Portus & APELS

 1. Top portuge in PADILIO (Printing Incompagnet)

 2. Per bar, in on the incompagnet in PADILIO (Printing Incompagnet)

 RADIOACTIVE

- 13 For OXYGEN, the word "OXYGEN" may be used in place of the word "OXIDIZER" on the OXIDIZER label. (Sec. 172.405 (a)) For foreign shipments, the NON-FLAMMABLE GAS label may also be required.
- 14 For CHLORINE, a CHLORINE label may also be used in place of the NON-FLAMMABLE GAS and POISON labels, (Sec. 172,40f to). For loreign shipments the NON-FLAMMABLE GAS label may also be required.
 - * New Liabers may be used in lieu of old labels. After January 1, 1982; new labels musicle used.

The liver decline or net include a congression of the DOR happing and that along the Dultements i For details, refer to Title 49. Charlet Federal Bigulations (E. 2015).



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Date: November 1, 1985 Revision No.: 0 H

APPENDIX H-2

RCRA Training Program Sample Test

HAZARDOUS WASTE

DO NOT MARK ON THIS TEST BOOKLET

	•		
1.	The federal law dealing with Hazardous Waste is called the Resource Conservation Recovery Act (RCRA) of 1976.	T	F
2.	The Environmental Protection Agency (EPA) is the Government agency responsible for regulating hazardous waste.	Ť	F
3.	The EPA's objective under RCRA is to regulate hazardous waste from the time it is generated until the time it is finally and safely disposed of. /	T	F
4.	Only generators and treatment disposal sites must notify the EPA of hazardous waste activity.	T .	F
5.	Generators, transporters, and treatment storage and disposal facilities must obtain an <u>I.D. number</u> from the Environmental Protection Agency.	Т	F
6.	Identification of Hazardous Waste utilizes EPA published lists, specific tests for various characteristics, and individual knowledge of the wastes.	T .	F
7.	The transporter is responsible for determining if a waste is hazardous.	T	F
8.	Ignitability, corrosivity, reactivity, and EP toxicity are the four EPA hazard characteristics.	T'	F
9.	All four hazardous waste characteristics must be present in order for a waste to be treated as hazardous.	_ T	F
10.	A generator who finds at a later date that pre- viously nonhazardous waste is now considered hazardous will not be held responsible.	T * .	F
11.	The "small quantity generator" exclusion applies to those generating less than 100 kg per month or 220 pounds per month.	T .	F
12.	Existing facilities have up to 3 years to report a hazardous waste after it has been listed.	т	F

13.	Some of the hazardous wastes generated at Rocky Flats include ignitable solvents, halogenated solvents, photographic solutions, and metal heat treating salt.		F
14.	Because the Manifest Document is a signed state- ment, it does <u>not</u> need to include such information as quantity of waste or number of containers.	T	F
15.	Rocky Flats must keep a signed copy of each Manifest Document for at least 5 years.	T *	F
16.	If a generator does not receive their copy of the manifest from the transporter within 35 days or cannot trace it in the next 10 days, an exception report must be filed after 45 days by the generator.	Т	F
17.	The first step of the Rocky Flats procedure for disposing of the hazardous waste is to complete a Waste Processing Request form.	T	F.
18.	Since onsite transportation of hazardous waste does not cross public roadways, Rocky Flats is exempt from Department of Transportation (DOT) regulations regarding packaging, marking, labeling, and securing of cargo.	T	F
. 19.	Transporters are responsible for reporting of spills during hazardous waste shipping.	Ť	F
20.	The law allows transporters to mix wastes without becoming hazardous waste generators.	Т	F
21.	Emergency procedures for spills at Rocky Flats include immediate action to stop or contain the spill and immediate notification of the shift superintendent.	T *	F
22.	The current law makes hazardous waste training voluntary at Rocky Flats.	T	F
23.	Noncompliance with RCRA standards is punishable with a \$25,000 fine and/or jail.	Ť	F
24.	Rocky Flats is characterized only as a generator facility.	Т	F
25.	Hazardous waste training is required every 2 years.	T	F

26.	A Manifest Document does not accompany nonradio- active hazardous waste shipped off plantsite.	T	F
27.	The plant's ground water monitoring program is exempt from the RCRA law.	T	F
28.	Hazardous waste containers should be nonleaking, compatible with contents, and be kept open for the waste to breathe.	T	F
29.	Rocky Flats has a sanitary landfill that may be used as a hazardous waste landfill.	T	F
30.	In addition to RCRA, there is now the State of Colorado Hazardous Waste Control Law and the regulating agency, the Colorado Department of	Ť	F

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Date: November 1, 1985 Revision No.: 0

APPENDIX H-3

Liquid Waste Training Material

Name			Employee No.	······································	
Date <u> </u>	. <u></u>		Shift		_
Division _	7	L11	ne Number or Job Assignment		
Instructor		· 	Title	·	
			CTURED TRAINING - CHECK LIST (and Classroom Instruction)		
Discuss on	ly tho	se iter	ns which are applicable to this job	assignmen	t.
I. HAZAF	RDS AN	D SAFE	ry		
A.	Hea 1	th Sci	ences	Trainee	Checked by
	1.	Mean: 1 eve	s of reducing radiation exposure ls		
		a.	respiratory protective equipment		*****
		b.	proper wearing of badges		
		c.	proper taping of wrists		
•		d.	hand counter operation and self- monitoring procedure review		•
		e.	personnel protective equipment		
		f.	glovebox gloves visual check		
		g.	glovebox negative pressure		
		h.	decontaminating		
		i.	housekeeping		
		j.	Personal showers when actively engaged in the process area		
		k.	B-box Procedures		
		1.	Barrel opening requirements		
	2.	Aları	ms		
		a	air monitor		
10/70		b.	enforce Health Sciences policies		

STRUCTURED TRAINING - CHECK LIST (QJT and Classroom Instruction)

I. HAZARDS AND SAFETY

Page 2

В.	Nucl	ear Sa	<u>fety</u>	Trainee	Checked by
	1.	Nucle	ear Materials Safety limits		
		a.	valid limits posted		
		b.	discussed		
		c.	read and understood		
		d.	operational audit before starting job assignment	9	•
	2.	Resp	onsibility		
		a.	set and enforce Nuclear Material Safety limits	s 	
•		b.	routine audits		
C.	I ndu	strial	Safety		
	1.		ty glasses and special safety equi as necessary	p-	-
	2.	Loca	tion of eye and safety showers		_
•	3.	Trip	ping and slipping hazards		
	4.	Ladd	er safety		
	5.	Them	mal burn safety		***************************************
	6.	Chem	ical hazards		
		a. .	hazard ratings		*****
		b.	Nitrogen hazard		
	7.	Visi a	bility in box glovebox free of sharp objects		*****************
	8.	HÍƠ	level alarms		

STRUCTURED TRAINING - CHECK LIST (QUT and Classroom Instruction)

I. HAZARDS AND SAFETY

Page 3

		Trainee	Checked by
9.	Proper and in good condition tools		
10.	Pump safety		
	a. guards in place		
11.	Housekeeping		
	a. inside glovebox		
	b. working area		. •
12.	Responsibility		
	 a. provide guidance that will preving to personnel and damage to property 	vent	
	 safety reviews and inspections buildings and areas 	of	
13.	Nonradioactive hazardous/toxic waste materials		·
	a. proper container		-
	b. proper label		
	c. proper storage		
	d. proper transporting equipment		
	e. personal protective equipment required		
Fire	Prevention		
1.	location of fire reporting phone, nea	rest	
2.	Housekeeping		
3.	Fire alarm emergency procedure		

STRUCTURED TRAINING - CHECK LIST (OJT and Classroom Instruction)

I. HAZARDS AND SAFETY

Page 4

٠.	4.	Glovebox gloves tied away from heat source		
	5.	Responsibilities	-	
		a. fire extinguisher glove entry		
		b. control of plutonium fires		
		c. fight and contain fires		
E.		Glovebox Safety		
	1.	Glovebox glove change		
	2.	Bag in - Bag out		
	3.	Drum removal		

N					Employee No	
Name			· · · · · · · · · · · · · · · · · · ·			
					Shift	
Divi	sion	<u>7</u> J	ob Assignment	Decontam	<u>ination Precipi</u>	tation
Inst	ruct	o r			Title	
					NG CHECKLIST INSTRUCTION)	
ii.	DES	CRIP	TION			
	, A .	The fro sta cla	pose purpose of this p m Plant liquid was ges, each with its rifier. MgSO ₄ , Ca portioned into the ontamination. A f the flocculator wh	own feed ta Cl ₂ , Fe ₂ (SO ₄ feed at the locculant is	nk, reactor, fl)3, and NaOH ar reactor to imp added to the r	occulator, and e rove esulting feed
	ъ.	Equ	ipment		Trainee	Checked by
		1.	Feed Tanks a. D-812 b. D-816 c. D-820			
		2.	Feed Tank Level C	ontrols		
		3.	Reactor Tanks a. D-813 b. D-817 c. D-819			
		4.	Reactor Tank Leve	1 Alarms		
		5.	Flocculator Tanks a. D-814 b. D-818 c. D-822			
		6.	Flocculator Tank	Level Alarms		

STRUCTURED TRAINING CHECKLIST (OJT and CLASSROOM INSTRUCTION) Radioactive Waste Decontamination Precipitation Page 2

	, •3• •	Trainee	Checked by
7.	Clarifier Tanks a. D-815 b. D-819 c. D-823		Checked by
8.	Clarifier Tanks Level Controls		
9.	First Stage Feed Streams		
10.	Second Stage Feed Streams		
11.	Third Stage Feed Streams		
12.	Sludge Removal Controls		
13.	Reagent Metering System Gang Pumps a. P-843 b. P-845 c. P-846		
14.	Feed Stream Controls through Three Stages		
15.	Level Transmitters		***
16.	Flow Transmitters	-	
17.	Turbidity Monitors		
18.	pH Analyzer	·	*
19.	Polishing Filter FL-831	•	
20.	Clarifier Effluent Tanks a. D-826 A b. D-826 B c. D-826 C		
21.	Process Lab Sampling Station		•

STRUCTURED TRAINING CHECKLIST (OJT and CLASSROOM INSTURCTION) Radioactive Waste Decontamination Precipitation Page 3

III. OPERATION

٨.	Preliminary Checks Before Operation	Trainee	Checked by
	1. Manual valves that are closed	•	
	2. Manual valves that are opened		•
	 Setting metering devices and reagent metering pumps 		
•	4. Setting slurry take-off timers	-	
	5. Starting recorders		
	 Breaker locations of all agitators and pumps 		
	Setting flow, level, and ratio controllers		
	8. Starting agitators		
	9. Clarifier level control switch		
8.	Start Up First Stage		,
	1. Flow control to D-812 Feed Tank		•
-	 Starting Feed Pump P-810 and Reagent Metering Pump P-843 		
	3. Flow to D-816 second stage Feed Tank by P-837	·	
	4. Starting slurry take off Timer KIC-7536		
c.	Start Up Second Stage		
	1. Flow control to D-816		

STRUCTURED TRAINING CHECKLIST (OJT and CLASSROOM INSTRUCTION) Radioactive Waste Decontamination Precipitation Page 4

	•		Trainee	Checked by
	2.	Starting Feed Pump P-811 and Reagent Metering Pump P-845		
	3.	Flow to D-820 third stage Feed Tank by P-838		
	4.	Starting slurry take off Timer KIC-7556		
٥.	Sta	rt Up of Third Stage		
	1.	Flow control to D-820		
	2.	Starting Feed Pump P-812 and Reagent Metering Pumps P-846		
,	3.	FL-831 precoat slurry preparation		
	4.	Precoating FL-831		
	5.	Putting FL-831 into operation		
	·6 ·	Flow control to FL-83 by P-852		
	7.	Starting slurry take off Timer KIC-7576		
Ε.	Ope	rating D-826 A, B, and C		
;	1.	Level limits 0-90%		
	2.	Sampling		
-	3.	Transferring to Evaporator Feed Tank		
	4.	Transferring to second or third stage Feed Storage Tanks		
	5.	Flow control to Evaporator Feed Tank D-827		

IV.

STRUCTURED TRAINING CHECKLIST (OJT and CLASSROOM INSTRUCTION) Radioactive Waste Decontamination Precipitation Page 5

F.	Sam	pling	Trainee	Checked by
•	1.	First stage D-812, D-815		
	2.	Second stage D-816, D-819		
	3.	Third stage D-820, D-823		
SHU	TDOW	N .		
A.	Nor	mal Shutdown		
	1.	Put all flow controllers into losset point	ca1	
	2.	Stop feed into D-812		
	3.	Stop first stage Feed Pump P-810 and Reagent Pump P-843		
	4.	Stop first stage Transfer Pump P-837		
	5.	Stop first stage agitators	•	
	6.	Stop feed into D-816		
	7.	Stop slurry take off Timer KIC-7536		
	8.	Stop Feed Pump P-811 and Reagent Pump P-845		
	Ģ.	Stop Second stage Transfer Pumps P-838		
	10.	Stop second stage agitators		
	11.	Stop feed into D-820		
	12.	Stop slurry take off Timer KIC-7556		

STRUCTURED TRAINING CHECKLIST (OJT and CLASSROOM INSTRUCTION) Radioactive Waste Decontamination Precipitation Page 6

			Trainee	Checked by
	13.	Stop Feed Pump P-812 and Reagent Pump P-846	~	
	14.	Take FL-831 out of operation		
	15.	Stop third stage Transfer Pump P-852		
	16.	Stop transfers from D-826 A, B, or C		
	17.	Turn off D-815, D-819, and D-823 level control switches		
•	18.	Manual valves that need to be closed		
В	. Eme	rgency Shutdown		
	1.	Stop all Pumps P-810, P-811, P-812, P-837, P-838, P-852, P-843, P-845, and P-846		-11
	2.	Tarn off power to FL-831 Panel		
	3	Stop all Feed Supply Pumps D-801 A, P, C; D-802 A, B, C; D-804 A, B, C, D; D-811 A, B; and transfer pumps that are in operation		
	4.	Turn off D-815, D-819, and D-823 level control switches		<u> </u>
	5.	Turn off Timers KIC-7536, -7556, and -7576		
		•		

STRUCTURED TRAINING CHECKLIST
(OJT and CLASSROOM INSTRUCTION)
Radioactive Waste Decontamination Precipitation
Page 7

Note:	Hazardous materials associated wi	th the operation:	
	• Filter aid		
	• MgSO ₄		
	• MgSO ₄ • CaCl ₂ • Fe ₂ (SO ₄) ₃ • NaOH		
	NaOHBasic waste feed stream		

CHEMICAL OPERATIONS LIQUID WASTE PROCESSING BUILDING 374

STRUCTURED ON-THE-JOB WALKTHROUGH EXAMINATION

Name	: <u></u>	Employee No.:			
Date	:	Shift:			
Divi	sion: VII Job Assignment: Decontami				
Administered By:					
		Trainee	Checked By		
1.	Demonstrate how to decant Tank D-824A.				
2.	Set up third stage to dump sludge for 6 seconds every 10 minutes.				
3.	Home the reagents that are added to the second-stage reactor Tank D-817.				
4.	Set up Tank D-826A to receive clarifier effluent from Tank D-823 via Pump 852.				
5.	Set up Tank D-804B to supply feed to the second-stage feed Tank D-816.				
6.	Set up Tank D-811B to supply feed to the first-stage feed Tank D-812.				
7.	What is the purpose of the turbidity monitors?				
8.	Demonstrate the startup and precoating of FL-831.				

CHEMICAL OPERATIONS LIQUID WASTE PROCESSING BUILDING 374

STRUCTURED CERTIFICATION EXAMINATION

Name Date		Employee No.:
Divi	sion: 7 Line No. or Job Assignment:	Precipitation
Dire	ctions: Circle the T if the statement is Ti statement is FALSE. 3 points for	
1.	Filtrate discharged from the vacuum drum fifirst-Stage Precipitation Feed Tank D-812.	lter is pumped to the
	T F	
2.	Third-stage clarifier effluent may be pumped (third-stage clarifier) directly to Evapora without obtaining sample analysis.	
	T ₁₀ F	
3.	The effluent stream from the third-stage controlled by the use of a level controller	
	T F	
4.	Checking reagent flows to the reactors is i precipitation process operator.	the responsibility of the
•	T F	•
5.	The purpose of the D-823 clarifier rake is precipitated solids to the slurry draw-off center of the clarifier bottom.	to slowly move the line located in the
	T F	
6.	Gamma scan surveys are routinely conducted in Building 374 in order to detect plutonia	on the process vessels m composites.
	T F	
7.	Precipitated sludge discharged from the clathe vacuum filter feed tanks (D-824A and B)	erifiers is drained to

Tanks D-811A and B provide feed to either
 D-816, second-stage feed tank; or D-820, third-stage feed tank.

T F

9. Respiratory protection, protective clothing, and radiation monitor is coverage is required for decontaminating any waste stream spills.

T F

10. Emergency procedure for a neutron alarm requires all pumps be turned off in the precipitation process.

T F

Directions: Circle the letter of the correct answer for each of the following questions. Four points for each correct answer.

- 11. Which of the following tank discharge streams can be sampled in the process lab?
 - Tank D-813, first-stage reactor tank
 - b. Tank D-823, third-stage clarifier
 - c. Tank D-814, first-stage flocculator tank
 - d. All of the above
- 12. What processes may be utilized within liquid waste processing for the treatment of waste liquids?
 - a. Neutralization
 - b. Precipitation
 - c. Filtration
 - d. Evaporation
 - e. All of the above
- 13. Second-Stage Feed Tank D-816 provides feed for which of the following?
 - a. D-813, first-stage clarifier
 - b. D-812, first-stage feed tank
 - c. D-827, evaporator feed tank
 - d. D-817, second-stage reactor tank

14. What is the permissible pH range used in the precipitation proper decontamination of the waste solutions?					
	a. 7.5 - 10.5				
	b. 6.0 - 9.5				
	c. 10.5 - 14				
	d. 0 - 14				
	e. 8.5 - 12.5				
15.	Which type of tank is associated within any one stage of the precipitation process?				
	a. Feed tank				
	b. Reactor tank				
	c. Flocculator tank				
	d. Clarifier tank				
	e. All of the above				
Dire	ections: Fill in the blanks to the following questions and/or statements. Five points for each correct answer.				
16.	. What is the purpose of the precipitation process?				
17.	When the second-stage flow is increased, what responds to increase reagent flow to the second stage?				
,					
18.	Why is flocculent added to the feed in the flocculators?				

	19.	Name the reagents used in the precipitation process.	
		1.	
	÷ .	2.	
•		3.	
		4.	
		5.	
	20.	What is the normal pH valve used in the precipitation process?	
•	21.	What is the purpose of Filter 831, and which tanks receive the discharge flow from Filter 831?	
	į.		
	22.	What controls the sludge dumps from the clarifiers to Tanks D-824A and B, and what means is used in determining how much to dump?	
	.•		
	23.	If the clarifier effluent collected in Tanks 826A or B does not meet radioactive guidelines for transfer to D-827 (evaporator feed tank), where must it be transferred to?	
, · · .	24.	In the precipitation process, waste solutions in Tanks 804A, B, C, and D are transferred to which stages of precipitation, and what determines to which stage the solution is transferred?	
٠.			

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